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Declaration of Bonnie Patten, Truth in Advertising (874 – 1246)

DECLARATION OF BONNIE PATTEN
Pursuant to 28 U.S.C. § 1746

I, Bonnie Patten, have personal knowledge of the facts and matters set forth below. If called as a witness, I could and would testify as follows:

1. My name is Bonnie Patten. I am a United States citizen over twenty-one years of age and am fully competent to give this Declaration.

2. I am the Executive Director of Truth in Advertising, Inc. (“TINA”). My business address is 984 Main Street, Branford, Connecticut, 06405.

3. TINA is a nonpartisan, nonprofit consumer advocacy organization whose mission is to combat deceptive advertising and consumer fraud; promote understanding of the serious harms commercial dishonesty inflicts; and work with consumers, businesses, independent experts, other consumer protection organizations and government agencies to advance countermeasures that effectively prevent and stop deception in our economy.

4. We are independently funded and do not accept any advertising dollars to support our work.

5. For years TINA has taken an active role in holding companies accountable for their deceptive marketing. To that end, in the regular course of business, we have documented more than 11,000 examples of deceptive earnings claims used by multilevel marketing (“MLM”) companies and their agents. We make this information available to the public on our website, which features deceptive and atypical earnings claims by more than 137 MLM companies.

6. As part of our mission, TINA began to investigate International Markets Live, Inc. (“IML”) in or about 2018. The company is also known as “iMarketsLive,” “IM Academy,” and “IM Mastery Academy.” Our investigation included both collecting information relating to IML online, and obtaining information directly from IML.

7. In or about early 2018, TINA staff began collecting earnings claims made by IML’s CEO, Christopher Terry, as well as IML distributors (known as “independent business owners” or “IBOs”). Generally, the claims represented to consumers that they could make large sums of money by purchasing IML’s services or joining IML as a distributor. Some of the claims explicitly referred

to earnings consumers would earn and other claims represented that consumers would be able to afford lavish lifestyles if they purchased IML's services or joined IML as a distributor.

8. On June 5, 2018, TINA emailed IML. In that email, TINA asked IML a number of questions about its business practices, inquired why the company did not disclose how much its IBOs earned, and asked the company for comment on the earnings claims TINA had collected. Two days later, on June 7, 2018, Frank Gomez, then Chief Operating Officer of IML, acknowledged the email. Attached as **Attachment A** is a true and correct copy of that email exchange.

9. On June 6, 2018, TINA published an article on its website regarding IML, titled "What You Should Know about iMarketsLive." The article raised a number of concerns with IML's business model, including that the company marketed its training programs as an easy way for consumers to make money trading in highly risky foreign currency markets. The article also summarized consumer complaints TINA obtained from the Federal Trade Commission about IML; the complaints stated that IML operated as a pyramid scheme. The article also flagged earnings claims by top IBOs in the company, and the fact that IML did not disclose how much its IBOs typically earned. Attached as **Attachment B** is a true and correct copy of the article as it was updated on March 7, 2022.

10. IML COO Frank Gomez sent an email response to TINA on June 19, 2018, attaching a letter from the company to TINA, along with three other attachments. A true and correct copy of the email, letter and attachments are attached as **Attachment C**. In his letter, Gomez wrote that "[w]e want to first commend [TINA] on your article as we feel it was fair and balanced and you did raise some important points that should be addressed." He refers to forex trading as "such a volatile Investment," notes that "there is high risk when investing money in FOREX," and states that IML's services are designed to "give the novice a better than average chance of learning how to invest wisely, [versus] jumping in with no education and losing their [sic] original investment."

11. Gomez's letter also states that "[w]e absolutely agree that unrealistic income claims, as well as any income claims on social media is not good. We acknowledge the fact that customers and IBO's [sic] have made posts on Facebook and Instagram, that may cast a negative shadow on

iMarketsLive and is in direct non-compliance to our terms and agreement and Policies.” Gomez further admitted that Christopher Terry, Alex Morton and Austin Godsey made claims on social media that were not in compliance with IML’s own policies and procedures. Gomez represented that all three individuals were removing the noncompliant claims, and that “[m]oving forward every one of our IBO’s [sic] and Customers will be trained with ‘Do’s and Don’ts’ in regard to any social media posts.”

12. On July 12, 2018, Frank Gomez sent another email to TINA enclosing a list of “income claims” that IML had removed from various social media platforms, “to ensure we comply with our policies and procedures as well as the proper and truthful marketing” of IML. The list of income claims that had been removed included nine Instagram claims made by “Chris Terry.” A true and correct copy of the email and attached list is attached as **Attachment D**.

13. IML did not provide answers to TINA’s questions about its IBOs’ typical earnings and did not provide TINA with an updated income disclosure statement, despite TINA’s requests for that information.

14. After receiving IML’s July 12, 2018 email, TINA continued to collect new income claims made by IML and its distributors.

15. On or about April 2019, IML posted on its website an updated income disclosure statement, entitled “iMarketsLive (IML) Income Disclosure Statement for 1-1-18 thru 12-31-18.” A true and correct copy of the income disclosure statement is attached as **Attachment E**. Based on this income disclosure statement, 95 percent of IML distributors had averaged an income of less than \$300 in 2018. And that figure did not include necessary expenses paid by the distributors.

16. On or about August 15, 2019, TINA published another article regarding IML’s earnings claims and its income disclosure statement. The article included deceptive claims made by Alex Morton, David Imonitie, and Austin Godsey. A true and correct copy of the article as it was updated on September 25, 2020, is attached as **Attachment F**.

17. On December 5, 2019, TINA submitted a complaint to the Direct Selling Self-Regulatory Council (“DSSRC”), regarding IML. A true and correct copy of the complaint is

attached as **Attachment G**. In addition to the complaint, TINA provided the DSSRC with a flash drive containing the IML earnings claims TINA collected in 2018 and 2019.

18. The DSSRC is self-regulatory program that was created by the Direct Selling Association, the national trade association for the direct selling industry. The DSSRC is administered by the Council of Better Business Bureaus.

19. TINA's complaint to the DSSRC pointed to IML's 2018 income disclosure statement, which disclosed that the vast majority of IML distributors made very little money with the program. TINA also noted that, after IML informed TINA that it had removed the problematic income claims TINA had identified in June 2018, TINA located an additional two-hundred deceptive income claims from IML and its distributors online.

20. On March 13, 2020, Kyle Lowe, IML's Chief Operating Officer, contacted TINA and asked for hyperlinks to the two-hundred income claims TINA cited to in its complaint to the DSSRC. Lowe stated that "iMarketsLive's compliance department is currently working to remove all income claims by our representatives that are recorded in your database." Attached as **Attachment H** is a true and correct copy of the March 13, 2020 email. TINA responded to that query on March 16, 2020 with an email attaching a list of hyperlinks to the claims. Attached as **Attachment I** is a true and correct copy of the March 16, 2020 email and attached list.

21. On April 29, 2020, the DSSRC sent TINA an email enclosing IML's response to TINA's December 2019 complaint. The response was written by John T. Moran, III, an attorney for IML, and included an attachment that Moran stated was a notice that was sent to all IML participants. Moran's response noted that IML's "Compliance Department has moved *post haste* to remove, delete and/or redact any and all" of the claims TINA had identified in its complaint. The response provided no substantiation for any of the claims that TINA had identified. A true and correct copy of that email and attached notice are attached as **Attachment J**.

22. TINA responded to Moran's statement on May 12, 2020 via a letter sent by email to the DSSRC. A true and correct copy of that letter and the email it was attached to are attached as **Attachment K**. In our letter, TINA noted that IML did "not dispute the fact that a multitude of

unsubstantiated and deceptive marketing claims have been (and are being) used to market its products and business opportunity.” Furthermore, we noted that after we received IML’s April 8, 2020 letter we were able to collect more than a dozen new examples of IML distributors making deceptive income claims – “all of which were published after iMarketsLive sent its April letter to the DSSRC vowing that it ‘has been vigilant in monitoring social media and on-line postings.’” Finally, we registered our concern that IML’s company policies did not prohibit its participants from “depicting results that are not representative of what consumers will generally achieve, even if the statements are honest and not exaggerated,” and cited to the FTC’s Guides Concerning the Use of Endorsements and Testimonials in Advertising, 16 C.F.R. § 255.2.

23. On July 1, 2020, DSSRC shared IML’s June 17, 2020 response to TINA’s May 12, 2020 letter, which was again authored by John T. Moran, III. A true and correct redacted copy of IML’s June 17, 2020 response to TINA’s May 12, 2020 letter, and the email it was attached to, are attached as **Attachment L**. In IML’s June 2020 response, Moran stated that IML “continues to seek assistance from the Federal Trade Commission via its index of Commission-issued guidance documents, specifically, “Business Guidance Concerning Multi-Level Marketing,” Question No. 13 – How should an MLM approach representation to current and prospective participants? To reiterate, [IML] will continue daily monitoring of social media and on-line postings and, of course, take action where necessary and consistent and compatible with FTC mandates and guidelines.”

24. On September 23, 2020, the DSSRC sent TINA an email attaching the DSSRC’s decision, including a statement from IML, regarding TINA’s December 2019 complaint. The email and attached decision are attached as **Attachment M**. The DSSRC noted that IML did not dispute that the claims TINA identified violated IML’s policies and procedures, and the DSSRC found that the removal of such claims was “necessary and appropriate.” The DSSRC recommended that IML “engage in effective training and monitoring of its IBOs” and “use appropriate enforcement procedures to provide reasonable assurance that earnings claims made by its IBOs are substantiated, contain appropriate disclosures and are not misleading.” The decision stated that IML had informed the DSSRC that “a first-time violation [of IML’s policies] by an IBO will result in counseling and

an initial warning letter from the Company;” a second violation by an IBO “will result in a warning letter and a temporary suspension,” and a third violation “will result in a termination of the IBO.”

25. The DSSRC’s decision further stated that “even truthful claims may be misunderstood by reasonable consumers and, therefore, an advertiser should possess and rely upon adequate substantiation for any truthful depiction of success,” and that “some claims may be so extraordinary that they cannot be effectively qualified by a disclosure of generally expected results.” IML’s response, which was included in the decision, stated “IML agrees with the DSSRC that even truthful claims may be misunderstood and that an advertiser should possess and rely upon adequate substantiation for any truthful depiction of success.”

26. Since the DSSRC issued its decision, TINA has collected more than 200 additional earnings claims by IML and its participants. TINA posts earnings claims by IML and its participants at <https://truthinadvertising.org/evidence/imarketslive-income-database/>. Since 2018, TINA has collected the following selection of claims by IML participants.

Claims By IML and Its Distributors Captured in 2018

27. In 2018, TINA collected earnings claims regarding IML that were available online. Attached as **Attachment N** are true and correct copies of screenshots of some of those earnings claims. Below each screenshot is the name of the file TINA assigned the claim for tracking purposes. Attached as **Attachment O** are true and correct transcripts of other earnings claims regarding IML collected by TINA in 2018 that were posted as videos online.

Claims By IML and Its Distributors Captured in 2019

28. In 2019, TINA again collected earnings claims regarding IML that were available online. Attached as **Attachment P** are true and correct copies of screenshots of some of those earnings claims. Below each screenshot is the name of the file TINA assigned the claim for tracking purposes. Attached as **Attachment Q** are true and correct transcripts of other earnings claims regarding IML collected by TINA in 2019 that were posted as videos online.

Claims By IML and Its Distributors Captured in 2020

29. In 2020, TINA again collected earnings claims regarding IML that were available online. Attached as **Attachment R** are true and correct copies of screenshots of some of those earnings claims. Below each screenshot is the name of the file TINA assigned the claim for tracking purposes.

Claims By IML and Its Distributors Captured in 2022

30. In 2022, TINA again collected earnings claims regarding IML that were available online. Attached as **Attachment S** are true and correct copies of screenshots of some of those earnings claims. Below each screenshot is the name of the file TINA assigned the claim for tracking purposes. Attached as **Attachment T** are true and correct transcripts of other earnings claims regarding IML collected by TINA in 2022 that were posted as videos online.

Claims By IML and Its Distributors Captured in 2023

31. In or about March, May and June 2023, TINA collected additional earnings claims regarding IML that were available online. Attached as **Attachment U** are true and correct copies of screenshots of some of those additional earnings claims. Below each screenshot is the name of the file TINA assigned the claim for tracking purposes. Attached as **Attachment V** are true and correct transcripts of other earnings claims regarding IML collected by TINA in or about March, May and June 2023 that were posted as videos online.

32. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 8, 2023
in Killingworth, CT.



Bonnie Patten

Attachment A



Laura Smith [REDACTED]

Re: MEDIA INQUIRY: IMarketsLive's inappropriate income claims

Bonnie Patten [REDACTED]
To: Frank J Gomez <frank.gomez@imarketslive.com>
Cc: [REDACTED]

Fri, Jun 8, 2018 at 12:08 PM

Hi Frank — just tried calling you. It appears you have a voice mail box that “has not been set up.” I’m in the office till 1:45 today or you can try me on Monday.

Bonnie Patten
Executive Director
[REDACTED]
truthinadvertising.org | @TruthinAd | facebook.com/truthinad

Keeping
Ads
Honest



On Jun 8, 2018, at 11:07 AM, Frank J Gomez <frank.gomez@imarketslive.com> wrote:

Dear Mr. Bonnie Patten, Executive Director of truthinadvertising.org

We responded yesterday to Mr. Bagley emails, but apparently we did not get the opportunity to the 7-10 days we requested and that was petitioned on my previous email. Would you please call me or contact me directly so we can discuss?

Cordially,
Frank J Gomez
Chief Operating Officer, iMarketsLive
<[image001.png](#)>
frank.gomez@imarketslive.com
(646) 265-8593

From: Frank J Gomez <frank.gomez@imarketslive.com>
Date: Thursday, June 7, 2018 at 12:03 PM
To: <[REDACTED]>
Subject: MEDIA INQUIRY: IMarketsLive's inappropriate income claims

Dear Mr. Bagley,

We received your email and we will address each issue listed, however we will need 7-10 business days to communicate with both our Legal and Compliance departments so we can provide you with a proper reply. We appreciate allowing us this time to respond.

Cordially,

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Frank J Gomez

Chief Operating Officer, iMarketsLive

<image002.png>

frank.gomez@imarketslive.com

(646) 265-8593

----- Original Message -----

Subject: MEDIA INQUIRY: IMarketsLive's inappropriate income claims

From: Jason Bagley <[REDACTED]>

Date: Tue, June 05, 2018 4:40 pm

To: compliance@imarketslive.com

Hello,

I am a journalist at truthinadvertising.org, a national consumer advocacy organization and website. I am seeking comment in regard to more than 50 inappropriate income claims our organization has compiled by iMarketsLive, including from its CEO: <https://www.truthinadvertising.org/wp-content/uploads/2018/04/ChrisTerryInstagram9.png>

Also, I have these questions in response to an investigation our organization conducted into IML's marketing:

Where is the IML income disclosure statement? A link to one in the compensation plan doesn't work.

Do most distributors make money? Do most distributors lose money?

Why should novice traders get involve in a notoriously risky market like forex?

Why isn't the need to hire a broker to make trades made more clear in IML's marketing?

For what reason is IML "unable to offer services" in 19 territories, as noted in its policies and procedures?

What is IML's response to being banned in Belgium, among other countries?

What is IML's response to consumer complaints to the FTC that allege it is a pyramid scheme?

What is IML's response to Wealth Generators' claims that it bribed its distributors and stole confidential information?

--

Jason Bagley

Staff Writer | www.truthinadvertising.org

[REDACTED]

| [REDACTED]
@TruthinAd | facebook.com/truthinad

<image001.png><image002.png>

Attachment B

Consumer News

What You Should Know about iMarketsLive

Questionable leaders and international bans are just the tip of the iceberg for this forex trading MLM.

Jun 06, 2018 | Updated March 7, 2022



Editor's Note: Updates have been posted at the end of this article.

You don't need to be Jordan Belfort, the "Wolf of Wall Street," to make Wall Street level money, according to iMarketsLive, a foreign exchange or forex trading with offices in New York and London. In fact, you don't even need to be awake. All you need, the company says, are the trading tools that iMarketsLive provides.

At the helm of iMarketsLive is its co-founder and CEO Christopher Terry. Terry, who boasts of making tens of millions of dollars in trading, got his start in multilevel marketing in the early 90s with Amway, where in lieu of actual earnings he says he cultivated a "mindset of wealth." Should you decide to get involved with iMarketsLive, you may find yourself similarly lacking in financial success.

That's because while iMarketsLive markets itself as a way for novice traders to "design [their] lifestyle" while generating residual income in their sleep, the truth is forex trading is a notoriously risky endeavor. As the SEC puts it:

It is common in most forex trading strategies to employ leverage. Leverage entails using a relatively small amount of capital to buy currency worth many times the value of that capital. Leverage magnifies minor fluctuations in currency markets in order to increase potential gains and losses. By using leverage to trade forex, you risk losing all of your initial capital and may lose even more money than the amount of your initial capital.

And if you think that you'll just market the "opportunity" to others and not use the products yourself, iMarketsLive requires distributors to use "the products and services of the Company on a regular basis" in order to receive any bonuses or commissions. (Editor's Note: In response to an inquiry by TINA.org, iMarketsLive Chief Operating Officer Frank Gomez said while this used to be the policy, it isn't anymore, even though TINA.org took the language straight from iMarketsLive's Policies & Procedures. Distributors, however, still must pay their "monthly subscription" to qualify for bonuses and commissions. Gomez said the company is amending the language.)

Here are a few more issues a TINA.org investigation dug up:

No learning required – really? ▼

In an interview with MLM blogger Troy Dooly in 2016, Terry explained why he chose to put forex at the center of his MLM, which he and CFO Isis De La Torre founded in 2013 :

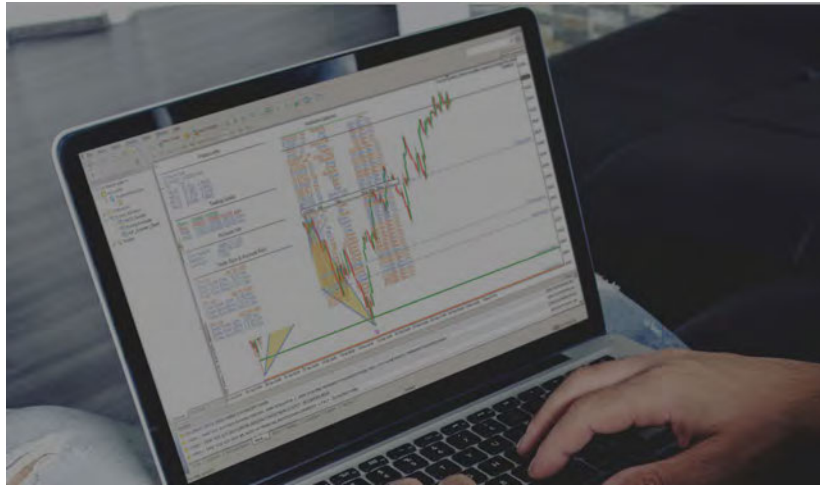
With iMarketsLive our primary focus is on forex and I'll tell you why: forex gives the individuals who don't have a lot of money a low barrier to enter. You could start a forex account for fifty bucks, where on these other markets it's a thousand, two thousand, five thousand. But forex allows people to come in at a very, very low price, [it's a] low barrier to entry and then they could learn.

But learning is not a requirement, Terry says later in the interview when discussing FX Signals Live. It is this program that iMarketsLive says allows a user's trades to mirror those the company traders are making whether they're "sleeping, partying, working, or all three." "Let's just say Troy Dooly doesn't want to learn," Terry says. "Just put your money to work. That's it." (Gomez informed TINA.org that FX Signals Live is "no longer in existence.")

Costly tools of the trade don't eliminate risk ▼

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But if you do want to learn (to the extent that learning is possible with the forex trading tools that iMarketsLive offers), you can watch Terry make trades in the Live Trading Room — where he claims in the Dooly interview he once performed for an audience of more than 4,000 people — and copy his moves. You can also glean supposed insights from the Harmonic Scanner, another iMarketsLive tool that the company says “automatically draws and labels different harmonic patterns in the FOREX market” and which Terry describes in the interview as a “learn and earn experience.”

But even the self-proclaimed “best trading education on the market” isn’t enough to protect customers from losing all their money, the company admits. In a disclaimer at the bottom of its website, iMarketsLive acknowledges that:

Trading contains substantial risk and is not for every investor. An investor could potentially lose all or more than the initial investment. Risk capital is money that can be lost without jeopardizing financial security or life style. Only risk capital should be used for trading and only those with sufficient risk capital should consider trading. Past performance is no guarantee of future results.

Moreover, in regard to the cost of the training tools (\$195 upfront and \$145 a month after that for the platinum package, which amounts to more than \$1,700 annually), one consumer’s complaint to the FTC says “you can easily get it for free on Youtube.” (See more FTC complaints below.)

Broker (and broker fees) not included



Though there is little to no mention on the official iMarketsLive website of the need to hire a broker to make trades, that is the reality. As Terry says in the Dooly interview, “I don’t take your investments. You invest with a broker. ... Your transaction fees, that has nothing to do with me.” (Which means they have everything to do with you.) In the interview, Terry seems to suggest that by not accepting investments, iMarketsLive is able to avoid

regulatory scrutiny, including from the National Futures Association. “I wanted our company to be clean,” Terry says when explaining why iMarketsLive doesn’t take investments. “Clean, clean, clean.”

But this raises the question: How much better are the trading tools that iMarketsLive offers than the services that a broker provides? If the company’s products are inferior by comparison, you may have a tough time selling the products. And if the “opportunity” side of the business is less about selling products than about recruitment, well, that’s one of the hallmarks of a pyramid scheme. (Gomez agreed that an emphasis on recruitment over product sales is one of the hallmarks of a pyramid scheme but said iMarketsLive’s customer-to-distributor ratio shields it from scrutiny, telling TINA.org: “[W]ith nearly 90% Customers and 10% IBO’s we feel it is very clear that IML is not about recruitment, it is about education and selling services which customers enjoy.” He did not provide supporting documentation.)

The business opportunity with its missing income disclosure



According to iMarketsLive’s compensation plan, those who purchase a platinum package are only \$30 away from becoming an independent business owner (IBO), which to hear the company and its distributors tell it, is where the real money is made (but not really — see unrealistic income claims section below).

The purchase of a \$195 platinum package generates 145 in group volume (GV). From there, IBOs need an additional 290GV and three “active members” in their downline to reach the first rank in the compensation plan, Platinum 150. But it’s a mystery how many IBOs even make it this far because while the compensation plan provides a link to see the income disclosure statement of distributors, the link as of the time of publication ... doesn’t work. (Gomez said this linked to an old income disclosure statement so the company had it removed. A new one is expected in 45-60 days. When it’s ready, Gomez said, it’ll be added to the compensation plan. UPDATE 4/26/19: It’s arrived and it’s confusing. But one thing appears to be clear: The vast majority of distributors — 87 percent — make only around \$50 a year on average.) It is therefore impossible to know how much iMarketsLive IBOs are *actually* making (or losing) beyond what is reported

through the company's promotional material, which skews toward those who are successful. Speaking of which...

Unrealistic income claims

It is unlawful for an MLM to make use of unusual earnings when discussing the income of its distributors. iMarketsLive's Policies & Procedures, to which all distributors are bound, actually takes it a step further, stating, "No past, potential or actual income claims may be made to prospective Independent Affiliates..." (More on this to come.)

Yet TINA.org has assembled a sampling of more than 50 inappropriate income claims made by iMarketsLive and its distributors. These include:

- "I just gave myself a \$60k raise in residuals and that's not even including my trading profits..."
- "[L]et's get you retired over the next 365 days!"
- "As an Independent Business Owner 'IBO' you can earn a full or part time income all at your own pace."
- "Not going to make income claims however he has an organization of several thousand people all over the world and doing well enough to have recently bought his parents a brand new house."
- "Average People Are Creating A Daily Income of \$150+ Online Without Having to Direct Sell, Cold Call, or Recruit Friends and Family. No Experience Required!"

(Gomez called the existence of any income claims "not good" and said iMarketsLive is "working with our leaders to address and eliminate income claims," including those identified by TINA.org. As of 7/12/18, 41 of the income claims in TINA.org's database had been taken down.)

Leadership has baggage

On the official iMarketsLive website there is zero mention of the Vice President of Sales Alex Morton. Morton got his start and rose to fame in the MLM industry as a distributor for Vemma Nutrition Company, an MLM which reached a \$238 million settlement with the FTC over allegations that it was a pyramid scheme in 2016. Morton was one of the FTC's star witnesses against Vemma at the preliminary injunction hearing as the FTC showed a video of Morton making inappropriate income claims. (Here's one of TINA.org's favorites from Morton's Vemma days.)

Just before the FTC sued Vemma, Morton jumped ship and moved to another MLM, Jeunesse Global, where he continued to make inappropriate income claims. In July 2016, Jeunesse faced a class-action lawsuit that alleged it was a pyramid scheme. This time round, the complaint named

Morton as a defendant and co-conspirator. Morton enlisted with iMarketsLive the very next month.

Morton uses his personal brand to promote iMarketsLive with particular attention paid to young people. On his personal Facebook page,

Morton regularly posts videos promoting his lifestyle with the promise that hard work in network marketing will yield the same results for others. In this video, he explains the iMarketsLive business opportunity to a room full of young adults with a focus on recruiting them as distributors — the same business practice that brought Vemma to the attention of the FTC.

In another video, Morton pledges to make anyone who wants to be one, a millionaire, though he buries the lead:

I told these two dudes yesterday at Applebee's, I said ... I am going to act as if I personally brought you in and your account is my account. Until these guys are both making at least \$25,000 a month, which is gonna happen very quickly, in the next 60 to 90 days, I am going to be here for you 24/7, 365, and that's my commitment to all of you on this call right now ... my goal is to have as many people as possible [making] \$10,000 a month and that's what we're doing ... anyone that wants to I'm going to make sure they become millionaires in iMarketsLive.

Clearly, Morton has not changed his ways.

In the Dooly interview, Terry says what attracted him to Morton was his “millionaire mindset” (we’re noticing a trend here). And in regard to what some might see as baggage, Terry says: “Whatever else there is out there in the public, the guy is the most incredible individual out there.”

(Regarding Morton, Gomez said, “We cannot change past actions other than removal of any social media posts, which he is actively doing.” As of 7/12/18, Morton had removed all of his posts identified by TINA.org. Some time in the months that followed, Morton was promoted to executive vice president.)



Global Visionariez making out-of-this-world claims

Morton isn't the only person involved in iMarketsLive who has used deceptive promises of wealth and lucrative lifestyles to lure young people to this MLM. Austin Godsey, the founder and CEO of an iMarketsLive-distributor group called Global Visionariez (GV) who holds the top rank of Chairman 100 in iMarketsLive, has boasted on Instagram of teenagers about to make six figure earnings:



Godsey says he was homeless before he discovered iMarketsLive. Now, he's a "7 Figure Earner," according to his Instagram profile. A couple other things he's said that are equally unbelievable (which is to say, out of reach for the vast majority of iMarketsLive distributors):

- "This ones (sic) is just for you from the GV fam... \$30,000/monthly... *Results aren't typical, so don't be typical." (Points for the wordplay but that's not exactly how disclaimers are supposed to work.)
- In regard to the success of an iMarketsLive distributor that Godsey says he took under his wing: "23 year old college dropout homeless 1 year ago Now making 2.5 million Pesos (about \$130,000 USD) a year in Mexico."

One can apply to become a member of Global Visionariez by filling out an online application that doubles as a platform for inappropriate income claims, requesting that applicants select from a list of monthly earnings the amount of "extra income" they're looking to make. The amounts range from \$100 to \$500 a month to more than \$100,000 a month, which, if you do the math, makes one a millionaire (if only it were as easy as checking a box).

(Gomez told TINA.org that Godsey "removed 99.99% of his Instagram posts, thus eliminating any non compliant posts." He added, "Austin now understands the gravity of posting 'out of this world' claims and there is no excuse for it." There's just one problem: Godsey did not remove 99.99 percent of his Instagram posts. He has the same number of posts — 206 —

as when TINA.org published these findings. We've added five containing inappropriate income claims to our database. UPDATE: As of 7/12/18, Godsey had removed all of his posts identified by TINA.org, in addition to scrubbing "7 Figure Earner" from his Instagram bio.)

You need to read the contracts

By signing up to become a distributor with iMarketsLive, one agrees to the company's Terms & Conditions and Policies & Procedures. The combined 33 pages contractually binds distributors to a multitude of provisions, including termination from the company at the discretion of iMarketsLive. Other items in the contracts that distributors should be aware of are:

- Advertising and Promotional Materials

Only company produced or approved materials can be used by affiliates. Anything else is in violation of contract.

- Money Back Guarantee

iMarketsLive offers a seven-day, 100 percent money back, satisfaction guarantee. Even so, a number of consumer complaints to the FTC cite problems getting a refund when trying to quit. One former subscriber states that they were charged for two months after trying to cancel their subscription.

- Clawback on Commissions

This section states: "Any commissions or bonuses earned and paid on products returned is the obligation of and must be repaid to [iMarketsLive] by Independent Affiliates earning such commissions. Company has the right to offset such amounts against future commissions and other compensation paid or owed to such Independent Affiliates who received commissions."

- Limitation of Damages

The company is not liable for any loss of profit, incidental, special, consequential, or exemplary damages. Basically, if the company traders lose all of your money, you're pretty much out of luck. All the company will pay back is "unsold company services and/or products" and any commissions owed to affiliates.

- Waiving Litigation Rights

Regardless of what type of dispute you may have with iMarketsLive or where you might live, distributors are stuck with binding arbitration in New York City.

- Inactive eWallet

This section states: "If the Independent Affiliate has not logged into his/her IML eWallet account within ninety (90) days, even if his/her IML account is still open, any and all funds in his/her IML eWallet account will be forfeited and returned to IML."

International bans, prohibited territories

If you're wondering what the "i" in iMarketsLive stands for, it's "international." Of course, this doesn't extend to the *entire* international community as financial regulatory organizations in the U.K., Spain, Columbia, France and Belgium have issued statements urging citizens not to invest in iMarketsLive, because the company is not an authorized financial institution in those countries. From the Belgian Financial Services and Markets Authority:

International Markets Live is not, however, authorized to offer financial services and products in Belgium. Moreover, the system proposed by International Markets Live exhibits features characteristic of a pyramid scheme.

Belgian authorities advise against "responding to any offers made by International Markets Live."

The company's Policies and Procedures lists 19 territories in which iMarketsLive is "unable to offer services," including China, Iraq and "Montana, USA," with no explanation given.

(Regarding the bans in Belgium and other foreign countries, Gomez said the company has hired lawyers to iron out what he described as a misunderstanding of the iMarketsLive business model and to "help us become complaint and registered" in those countries. As for the prohibited territories, Gomez said: "There are two main reasons. The first is the federal sanctions placed on specific countries by the US Government. The second is we just do not do business in some countries where the risk for fraud is high." He didn't explain Montana.)

Complaints accuse iMarketsLive of operating a pyramid scheme

Among the complaints to the FTC obtained by TINA.org through a Freedom of Information request are consumer woes concerning trouble with cancellations, pushy distributors, and pyramid scheme accusations. Here are some notable excerpts:

- "[I] joined imarketslive in june 2017. [I] wanted to learn to trade but all guys on top wanted was marketing. [I] realised its (sic) an (sic) pyramid scheme ... alot (sic) of people contacted me on instagram and said same thing."
- "It's a complete ripoff. I got invited to a meeting and when I asked where are the headquarters, they literally told me that they don't have an actual office. That the owner runs the company remotely from his hotel room in Las Vegas."

- “I attended a meeting and one thing I noticed about this group is that they prey upon minorities looking to get rich quick due to financial hardships.”
- “I decided to unsubscribe (sic) and block them from my bank which apparently they already had the company in the list of scams.”

But the most colorful complaint by far does not mince words when it calls iMarketsLive “a huge scam consisting of pathological liars and thieves that illegally represent bs in disgusting ways I have never experienced.”

Competitor claims iMarketsLive stole confidential information

Perhaps because of that binding arbitration clause (see contracts section above), litigation involving iMarketsLive is scarce. However, one particular legal challenge is pretty juicy.

A competitor, Wealth Generators (WG), sued iMarketsLive in November 2017 alleging that iMarketsLive stole confidential information, intellectual property, business, and even bribed WGs’ leaders to leave the company and join iMarketsLive. The complaint alleges that iMarketsLive’s “Binary Options Live Educational Platform” was implemented after the theft of “confidential information” from WG by former WG distributors that iMarketsLive attempted to lure to the company. Terry, De La Torre (the CFO), Morton, and top distributors in the company were named as defendants. Terry is alleged to have called the acquisition of the confidential information and WG distributors “a massive benefit for iMarketsLive.”

The company has also gone to court as a plaintiff. In February 2018, the company filed a five-count complaint against Chakra Capital Group and others alleging trade libel and civil conspiracy to commit libel, among other things. Specifically, the complaint alleges that defendant Robert Halterman, who controls Chakra Capital Group, used his website and Facebook page to post derogatory comments about iMarketsLive, making claims like:

They are a pyramid scheme solely focused on recruiting and ranking up. They use forex to ENTICE people to get other people to join.

The company is claiming damages in excess of \$1 million.

(Gomez described the Wealth Generators lawsuit as an “incorrect complaint” and in regard to the company’s case against Halterman said “he removed all negative and slanderous comments on Facebook and we removed our lawsuit.” Indeed, the claims filed by iMarketsLive against Halterman, as well as three other defendants in that case, have been dismissed.)

For more on TINA.org’s coverage of MLMs, click [here](#).

UPDATES

9/25/20: The Direct Selling Self Regulatory Council (DSSRC) has issued a case decision based on a TINA.org complaint finding that iMarketsLive and its distributors were making inappropriate income claims to promote the company's business opportunity. The DSSRC recommended that the company "engage in effective training and monitoring of its IBOs (distributors) and use appropriate enforcement procedures to provide reasonable assurance that earnings claims made by its IBOs are substantiated, contain appropriate disclosures and are not misleading."

1/10/20: iMarketsLive has a new website and a new name: IM Mastery Academy.

6/26/18: iMarketsLive has filed another defamation lawsuit, this time against the founders and employees of Copy Profit Success Global, an MLM that, according to the suit, plans to roll out its own forex trading tools in the future.

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iMarketsLive Financial Document Debunks Income Claims

MLM's long-awaited income disclosure statement, while confusing, packs some hard truths.





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Attachment C



Laura Smith <[REDACTED]>

Fwd: In reference to the media inquiry: IMarketsLive's inappropriate income claims

[REDACTED]

[REDACTED]

----- Forwarded message -----

From: **Frank J Gomez** <frank.gomez@imarketslive.com>

Date: Tue, Jun 19, 2018 at 4:53 PM

Subject: In reference to the media inquiry: IMarketsLive's inappropriate income claims

To: Jason Bagley [REDACTED]

Dear Mr. Bagley

I am sending you with attached to this email four documents in support of our Media Inquiry related to our company International Markets Live. Please, after you have had the chance to review them let me know if there are any further comments or need of support document you may need.

Cordially,

Frank J Gomez

Chief Operating Officer, iMarketsLive



frank.gomez@imarketslive.com

(646) 265-8593

From: Jason Bagley [REDACTED]
Date: Monday, June 11, 2018 at 8:29 AM
To: Frank J Gomez <frank.gomez@imarketslive.com>
Subject: Re: MEDIA INQUIRY: IMarketsLive's inappropriate income claims

Hi Frank,

Thanks for the response. I have an appointment this morning but am available to talk this afternoon, after 2. I can also take the answers to my questions in writing. Tx.

PX17

000899

O` Thu, Jun 7, 2018 at 12:03 PM, Frank J Gomez <frank.gomez@imarketslive.com> wrote:

Dear Mr. Bagley,

We received your email and we will address each issue listed, however we will need 7-10 business days to communicate with both our Legal and Compliance departments so we can provide you with a proper reply. We appreciate allowing us this time to respond.

Cordially,

Frank J Gomez

Chief Operating Officer, iMarketsLive



frank.gomez@imarketslive.com

(646) 265-8593

----- Original Message -----

Subject: MEDIA INQUIRY: iMarketsLive's inappropriate income claims

From: Jason Bagley [REDACTED]

Date: Tue, June 05, 2018 4:40 pm

To: compliance@imarketslive.com

Hello,

I am a journalist at truthinadvertising.org, a national consumer advocacy organization and website. I am seeking comment in regard to more than 50 inappropriate income claims our organization has compiled by iMarketsLive, including from its CEO:

<https://www.truthinadvertising.org/wp-content/uploads/2018/04/ChrisTerryInstagram9.png>

Also, I have these questions in response to an investigation our organization conducted into IML's marketing:

Where is the IML income disclosure statement? A link to one in the compensation plan doesn't work.

Do most distributors make money? Do most distributors lose money?

Why should novice traders get involve in a notoriously risky market like forex?

Why isn't the need to hire a broker to make trades made more clear in IML's marketing?

For what reason is IML "unable to offer services" in 19 territories, as noted in its policies and procedures?

What is IML's response to being banned in Belgium, among other countries?

What is IML's response to consumer complaints to the FTC that allege it is a pyramid scheme?

What is IML's response to Wealth Generators' claims that it bribed its distributors and stole confidential information?

--

Jason Bagley

Staff Writer | www.truthinadvertising.org

[REDACTED]

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--

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Jason Bagley

[REDACTED]


[REDACTED]

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4 attachments

 **TINA - Copy[1].docx**
32K

 **Memorandum[4].pdf**
57K

 **doc03384920180524100142[2].pdf**
470K

 **hyperwallet systems[1].pdf**
243K

International Markets Live, Inc.

45 Rockefeller Plaza - New York, New York 10111- www.imarketslive.com

June 18, 2018

Truth in Advertising

Subject: MEDIA INQUIRY: iMarketsLive's to June 6, 2018 Questions

Attention: Jason Bagley,

Dear Mr. Bagley,

This letter is in response to your email with the above mentioned subject of "iMarketsLive's inappropriate income claims" and the Article you published to www.truthinadvertising.org on June 6, 2018 "WHAT YOU SHOULD KNOW ABOUT IMARKETSLIVE"

We want to first commend you on your article as we feel it was fair and balanced and you did raise some important points that should be addressed. We also appreciate you allowing us to respond to the article, so we may further educate you about our business model and any questions that your article raised. We ask with our response you would also update your article to show our company is constantly striving to operate within regulatory guidelines.

I want to first address the email questions, then address the content of the article that we feel would be responsive with further information.

Where is the IML income disclosure statement? A link to one in the compensation plan doesn't work.

The company has experienced hyper growth over the past 12 months. Our former Income Discloser became obsolete and has been removed. Our legal/accounting team is currently working on a new Statement and will be included in the next 45-60 days.

We are revamping imarketslive website front end and back office to a completely new site, with a new look. The new site will be reviewed by our compliance and legal team before it goes live. We would be willing to allow you to review the new website prior to its release for your approval in event you find anything that needs to be amended, the expected release will be in the next 45-60 days.

Do most distributors make money?

As with most affiliates, their income from building a team, varies based on their individual efforts, geographical locations, and overall sales and marketing talent. With the new income disclosure statement, which we will send to you prior to, or at the same time we make it public, it will give the specific numbers. We do not consider our IBO's to be Distributors, they are Independent Business Owners.

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Currently, there are approximately **6,500 IBO's**, Independent Business Owners who receive commission payments for their direct/indirect retail sales of our services of our **68,000 non-incentivized paying customers**, those customers pay for our services without interest in taking part of the MLM/NWM Compensation Plan, **this is around 90%:10% Customer/IBO Ratio**. Our compensation plan has a minimum 55% Retail Customer Ratio before our compensation plan, triggers any commissions to an IBO.

Do most distributors lose money?

Until the accounting and legal team sign off on the specific income disclosure statement, I cannot give you specifics. I can say that since its \$15 to become an IBO, I am not sure any IBO can lose money above the \$15 monthly cost. However, from a customer standpoint, as with any type of investment, there will be some who may have lost more than they have paid in their subscription fees, while others have earned more than their subscription fees. Again, when we get the new income disclosure statement, I will forward directly to you.

We would like to clarify that an individual can join as 1. IBO for \$15 Per Month or 2. Customer for \$195 to start and \$145 per month, or 3. IBO & Customer. There is no restriction and no IBO is required to purchase any services. To Earn Income, a IBO must have minimum 55%:45% Customer Volume. We do not consider an IBO who uses the services to be a customer, a customer pays for services without the incentive to earn commissions on any referrals.

Why should novice traders get involved in a notoriously risky market like forex?

When I launched IML, I did it so the novice investor could become educated and use a "Practice or Demo Account" prior to actually investing their money in such a volatile Investment. I am sure you are well aware that Forex Trading for the most part is done by institutional investors, who can with just a fraction of a percent earn or lose millions. Our goal was to give the novice a better than average chance of learning how to invest wisely, verses jumping in with no education and losing their original investment.

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We want to be clear on several things

1. We do not accept any investments whatsoever, our services are month to month based model.
2. We do not earn any trading commissions from any brokers as we have 0 relationships with any brokers whatsoever. We have never accepted nor plan to accept any broker commissions.
3. iMarketsLive does not receive any performance fee's, if a member invests \$1,000 into his brokerage account, and makes \$100, this is his or her money, we have no relationship whatsoever. We have no access to any account information and that is between the customer and his or her broker.
4. iMarketsLive members can turn off their services at any time.
5. iMarketsLive does not direct nor controls any accounts.

Why isn't the need to hire a broker to make trades made clearer in IML's marketing?

There is a need for a broker, just as you need a Broker when buying or selling a house. As I stated above, IML isn't a brokerage and we do not trade on behalf of any clients or IBO's. We offer an educational subscription model and that is all. We do not suggest any broker, we leave that to the customer who has to do their own due diligence. Those individuals, who are seeking services, like those at IML, fully understand, IML isn't a broker and provide no avenues for them to invest or trade their funds through out company.

For what reason is IML "unable to offer services" in 19 territories, as noted in its policies and procedures?

There are two main reasons. The first is the federal sanctions placed on specific countries by the US Government. The second is we just do not do business in some countries where the risk for fraud is high. Our merchant compliance partner's guide us in this area. With their expertise and advice, we have made this decision. We also do not do business in the state of Montana.

What is IML's response to being banned in Belgium, among other countries?

Our company has grown exponentially around the globe as customers enjoy our services globally as Forex Education is highly desired. With our growth we have found regulators in several countries that do not understand our business model have issued warnings. These authorities feel we are a 'Broker' or an 'Investment Advisor' which is completely incorrect.

Rather than ignoring the authorities, we have engaged top Law Firms from around the globe to work with their network of firms in the various countries to communicate and work with any and all authorities to help us become compliant and registered.

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I have attached letters from 1. Bailey Duquette our US Attorney who coordinates with 2. German Alberto Rey Hoyos in Colombia and 3. SBS|LEGAL in Germany who works with their network of European Attorneys in various countries. We also have an attorney who has helped us become CFTC Compliant, Steptoe and Johnson, along with Sterling Kerr office who has worked on the US Compliance and Litigation.

We asked these attorneys to provide a letter to our E-Wallet Vendor prior to your Article and as you will notice we are proactively seeking to become globally compliant.

What is IML's response to consumer complaints to the FTC that allege it is a pyramid scheme?

I checked with our legal and compliance team, and we have not been notified of any complaints with the FTC. If you have a specific complaint you are referring, please send for our review and I will gladly respond.

We also have provided to you the minimum Customer/IBO ratio which is 55%/45% and our current actual Ratios, these far exceed the minimum customer/IBO ratios for a pyramid scheme.

What is IML's response to Wealth Generators' claims that it bribed its distributors and stole confidential information?

We have attached a letter from our Attorney Sterling Kerr, this should satisfy your question.

We hope the above responses to your questions are sufficient enough to clear up any concerns or confusion about iMarketsLive.

We did want to respond to your email comment about our CEO, Christopher Terry's Instagram. We agree that his comment was out of compliance and in-fact was a human error(s) and without bad intention or malice whatsoever, but with the excitement of seeing his IML IBO's and Customers become successful, which we agree is not an excuse.

We have advised him to review his Instagram and remove any questionable posts that may be deemed non-compliant in regards to Income Claims, he is actively making an immediate effort to perform these actions.

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In your Article on the TINA website, you made this statement.

"You don't need to be Jordan Belfort, the "Wolf of Wall Street," to make Wall Street level money, according to iMarketsLive, a foreign exchange or forex trading MLM with offices in New York and London. In fact, you don't even need to be **awake**. All you need, the company says, are the trading tools that iMarketsLive provides."

The word "awake" leads to this link <https://www.truthinadvertising.org/wp-content/uploads/2018/05/iMarketsLive-FX-Signals-Live.png> which shows a picture of a "old" service that imarketslive had, and this was an old snapshot from our website.

We want to mention that we have had products that had been questionable due to changes in Europe with the new MiFid II law (January 2018) , the product was "FXsignalsLive" Auto-Trader, this law has caused Auto-Trading, Mirror Trading, Copy Trading all in the same, to be deemed illegal, with that we have removed the products early 2018 after the new law. The issues with some of the Authorities are connected to the FXsignalslive product, which is no longer in existence.

We would appreciate this to be updated as the "awake" reference refers to a service that does not exist.

"And if you think that you'll just market the "opportunity" to others and not use the products yourself, iMarketsLive **requires** distributors to use "the products and services of the Company on a regular basis" in order to receive any bonuses or commissions."

The word "requires" leads to this link <https://www.truthinadvertising.org/wp-content/uploads/2018/05/Payment-of-Bonuses-and-Commissions-iMarketsLive-Policies-Procedures-1.pdf>

which shows " **8.05 PAYMENT OF BONUSES AND COMMISSIONS**

In order for any member or independent affiliate to receive any bonuses or commissions from the Company, the member or independent affiliate must be "Active" and in "Good Standing". "Active" refers to a member or independent affiliate that is **paying their monthly subscription and using the products and services of the Company on a regular basis**. "Good Standing" refers to a member or independent affiliate that does not owe any monies to the Company"

Based on that section, you are correct to have made that comment, this is a complete oversight as we updated our compensation plan in June of 2016 and the new plan allows somebody to become an IBO and earn without using the services whatsoever, as long as they have the proper customer sales.

We are amending the section to read.

8.05 PAYMENT OF BONUSES AND COMMISSIONS

In order for any independent affiliate to receive any bonuses or commissions from the Company, the member or independent affiliate must be "Active" and in "Good Standing". "Active" refers to a independent affiliate that is paying their monthly subscription. "Good Standing" refers to an independent affiliate that does not owe any monies to the Company"

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Please refer to our compensation plan [http://www.myimarketslive.co/Final IML Comp 5 \(1\).pdf](http://www.myimarketslive.co/Final%20IML%20Comp%205%20(1).pdf) and See "How to Get Started" on page 3, it reads

1. If you join as an IBO, the cost is \$15 with a monthly renewal of \$15 to keep your business active. Being an IBO lets you share the IML products and services with others, while taking part in the Compensation Plan. **There is no requirement to purchase the Platinum Package as an IBO,** though we highly recommend it. You must be an IBO to take part in this Compensation Plan.

Items in Question:

No Learning Required – This is an old Video about Old Services that no longer exist, had these products been currently active you would be correct to mention, however they are no longer in existence.

Costly Tools of the trade don't eliminate risk –

We agree, there is high risk when investing money in FOREX, we make this very clear, we also have disclaimers and we do not suggest anyone to invest any money with a broker at any time, this is solely the individual's choice, we provide education.

We want to refer to this link

<https://www.truthinadvertising.org/wp-content/uploads/2018/05/iMarketsLive-training-complaint.pdf> the person says "you can easily get it for free on Youtube." We do not agree with this comment, and his comment does not speak for the nearly 70,000 customers who vote by paying for our services and find the value far exceeds the price. We would further state, that in reviewing many purported "free videos" on YouTube, the majority come with an upsell, or an advertisement from some broker for individuals to open trading accounts.

Broker and Broker Fee not included – your comment "But this raises the question: **How much better are the trading tools that iMarketsLive offers than the services that a broker provides?** If the company's products are inferior by comparison, you may have a tough time selling the products. **And if the "opportunity" side of the business is less about selling products than about recruitment, well, that's one of the hallmarks of a pyramid scheme.**"

Reply to the First bolded comment, we provide the education, the broker facilitates the trade, two different services, IML is not a broker as we mentioned and does not accept any investments whatsoever. And, although, some brokers offer tools. These tools are at times, tied strictly to that broker to force the individual to trade with only that broker.

The Second Bolded comment, with nearly 90% Customers and 10% IBO's we feel it is very clear that IML is not about recruitment, it is about education and selling services which customers enjoy. We agree selling only of an opportunity is the hallmark of a pyramid scheme, fortunately we are compliant in that matter.

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We feel the entire section above should be removed based on the comments we mentioned which clear up any confusion.

The Business Opportunity with its missing income disclaimer – We answered this in the questions section.

Unrealistic income claims – We absolutely agree that unrealistic income claims, as well as any income claims on social media is not good. We acknowledge the fact that customers and IBO's have made posts on Facebook and Instagram, that may cast a negative shadow on iMarketsLive and is in direct non-compliance to our terms and agreement and Policies.

We recently hired Donna Marie Serritella of Direct Selling Solutions, <http://directsellingsolutions.com/> Within the industry is considered the *Queen of Compliance*. Donna Marie is our Director of Compliance is working with our leaders to address and eliminate income claims.

In addition, Donna Marie is working with the Compliance Team to increase consistent monitoring, fair enforcement, and Compliance education in the field. We have established a Compliance Department to address IBO Compliance inquiries, IBO reports regarding non-compliant activities, and to educate the field in Compliance requirements. The Compliance Department is tasked with having a proactive approach to IBO Compliance.

We also have been working with Troy Dooly as a advisor <http://troydooly.com/> , through his firm www.lighthouseideacrafters.com and he is working and he is working with Donna Marie and her team to help eliminate income claims and other non-compliance situations, through a series of accountability videos. He released a video on his website 2 months ago <https://vimeo.com/261562170> regarding Income Claims and will continue to increase field Compliance awareness, though IML specific compliance series, as well as working directly with Mr. Terry on a new series of current interviews about IML.

We hope this helps shed better light how we are active in our effort to clean up any claims.

Leadership has Baggage – Alex Morton although he along with our CEO, has made errors in comments or posts from the past, has been notified to eliminate any communication that is considered any type of income claims. We cannot change past actions other than removal of any social media posts, which he is actively doing. Alex is active and currently compliant on his social media and any public speaking. Alex is an advocate for eliminating income claims, and any other compliance issues brought to his attention. We appreciate you bringing this to our attention.

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Global Visionaries making out of the world claims. – We acknowledge and agree that this type of behavior is not compliant with iMarketsLive policies and procedures. Although Austin Instagram posts where non-compliant, he has removed 99.99% of his Instagram posts, thus eliminating any non-compliant posts also. Austin now understands the gravity of posting “out of this world claims” and there is no excuses for it. Moving forward every one of our IBO’s and Customers will be trained with “Do’s and Don’ts” in regard to any social media posts.

International bans, prohibited territories – We covered this part in the earlier part of our reply.

Complaints accuse iMarketsLive of operating a pyramid scheme – We covered this earlier in our reply regarding why IML is not a pyramid scheme, however reading the 4 complaints you quoted, none of them show fact that IML as a pyramid scheme. IML Sells Retail Educational Services, month to month, we do not take any investments, do not accept any broker commissions. What your “quotes” show are complaints based on that person’s opinions only, but opinion as you know does not make it illegal whatsoever.

Competitor claims iMarketsLive stole confidential information – We attached a letter from our attorney regarding this incorrect complaint from Wealth Generators. They filed an Injunction on IML and the Judge ruled against WG.

In regard to Robert Halterman of Chakra Capital Group, he was slandering IML as stated in the complaint, he removed all negative and slanderous comments on Facebook, and we removed our lawsuit. We have no further comment to this.

In closing, we hope we have made our response clear, concise, with complete transparency, if you have any follow up questions, we welcome them. Based on our responses, if you can please update the article to reflect all the positive actions we have taken both in advance of and after your publication as well as the questions you have asked us directly. We will follow up as mentioned on any information we do not currently have yet.

Frank Gomez

Chief Operating Officer

International Markets Live, Inc.

45 Rockefeller Plaza - New York, New York 10111- www.imarketslive.com

Law Offices of P. STERLING KERR

Memorandum

To: General Public

From: Law Offices of P. Sterling Kerr

RE: Wealth Generators Lawsuit Against International Markets Live, et. al.

Case No: 170401615

In November 2017, Wealth Generators, LLC a network marketing company, doing business in Utah, filed a Civil Complaint against International Markets Live and various individuals. The Civil Complaint was filed in a Utah State District Court and asserted in general that various former independent contractors employed by Wealth Generators had been induced by International Markets Live and its CEO, Christopher Terry to leave Wealth Generators and join IMarketsLive, a competing network marketing company. The Law Offices of P. Sterling Kerr were retained by certain of the defendants to defend the lawsuit and Utah attorney Chris Dexter was hired as local counsel.

Rather than Answer the Civil Complaint, the validity of the Complaint was challenged with respect to jurisdiction of the Utah Court over certain defendants, including International Markets Live and Christopher Terry. That Motion to Dismiss filed by these defendants is still pending with the court. In addition, other of the defendants filed Motions to Compel Arbitration (the former independent contractors of Wealth Generators have an arbitration clause in their contracts with Wealth Generators that prohibits a Civil lawsuit, but rather requires arbitration of disputes). The Motion to Compel Arbitration is still pending with the court.

More seriously, Wealth Generators sought to obtain an injunction against several defendants asking the Court to enforce a covenant not to compete in agreements that certain defendants had with Wealth Generators. That Motion for Preliminary Injunction was heard in May 2018. A full evidentiary hearing occurred in the Utah Fourth Judicial District Court. At the conclusion of the hearing, the District Court Judge **denied** the Wealth Generators requested injunction. The former contractors of Wealth Generators are free to be employed by International Markets Live or any other competitor of Wealth Generators. The District Court's denial of the injunction was a significant blow to the lawsuit brought by Wealth Generators as it was clear that Wealth Generators had not met its evidentiary burden to show a likelihood of success on the merits of the case. The detailed opinion of the District Court Judge will be issued shortly. At this point the Wealth Generators case against the defendants, including International Markets Live and Christopher Terry, favors the defendants. Counsel for defendants expect the jurisdictional Motion to Dismiss to be granted and it is likely that the Court will dismiss the case against former contractors of Wealth Generators and compel arbitration.



SBS Legal Rechtsanwälte GbR · Hans-Henny-Jahnn-Weg 49 · 22085 Hamburg

Hyperwallet Systems Inc.

STEPHAN R.
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Hamburg, 24.05.2017

In Kooperation mit:

SBS | TAX
Steuerberatung

SBS | DATA
Datenschutz

Ladies and Gentlemen:

Since May 2018, our Law Firm represents the company International Markets Live, Inc. in Germany. Moreover, we are organizing the pan-European representation in the countries Spain, France, UK, Belgium, Italy, Denmark, Slovenia and all other countries in which International Markets Live, Inc. operates based on our lawyer's network at present. The goal of our legal representation is, in coordination with the competent authorities, to ensure compliance of International Markets Live, Inc.'s activity with all legal European and national requirements and a completely lawful conduct.



According to the information available to us the International Markets Live, Inc.'s business model is not to offer capital investments, generate broker commissions or income from trading performance, but the offering of education products and the associated services.



Stephan R. Schulenberg LL.M. Eur.
Attorney

SERVICIOS LEGALES Y CONTABLES

Bogota, may 28th 2018

To

HYPERWALLET SYSTEMS INC.

The legal advisory team of iMarketsLive in Latin America wants to state that

- Since last year 2017 we are managing the legality of the company in Colombia, so that its education business can be developed fulfilling all the requirements of law.
- Likewise, contacts have been made so that in other Latin American countries, such as Peru and Ecuador, local lawyers initiate legalization processes of iMarketsLive according to the requirements of each country.
- Due to the assertions of some control entities in Latin America, we can see that the officials in charge of supervising financial institutions or multilevel companies have misunderstood the objective of iMarketsLive, a company that is exclusively dedicated to education and services for improving performance of people who wish to learn to operate international markets.
- The company wants to make it clear, both to the general public and to the relevant authorities, that iMarketsLive
 - Receives as income only the monthly payment for training services and technical instruments for their students
 - Does not raise any money for financial investments
 - Does not represent any broker or brokerage house
 - Does not recommend any particular financial institution and therefore, does not receive commissions for recommending a specific broker
 - Does not receive any income for trading performance or profits from operations of its students.



GERMAN ALBERTO REY HOYOS
CC. # 79.486.900 de Bogotá
Legal Rep. in Colombia

Attachment D



Laura Smith <lsmith@truthinadvertising.org>

Fwd: In reference to the media inquiry: IMarketsLive's inappropriate income claims

[REDACTED]

[REDACTED]

----- Forwarded message -----

From: **Frank J Gomez** <[REDACTED]>
Date: Thu, Jul 12, 2018 at 11:37 AM
Subject: Re: In reference to the media inquiry: IMarketsLive's inappropriate income claims
To: Jason Bagley <[REDACTED]>

Dear Mr. Bagley

As we continue to research our media outlets, I would like to inform you that we have taken further corrective actions to ensure the removal of conflicting messages and webpages on the internet. In the attached file, you will find a list of pages that have been removed from internet to ensure we comply with our policies and procedures as well as the proper and truthful marketing of IMarketsLive's messages. Please advise at your earliest convenience when can we expect a response from you with your comments.

Cordially,

Frank J Gomez

Chief Operating Officer, iMarketsLive



[REDACTED]

[REDACTED]

From: Frank J Gomez <[REDACTED]>
Date: Tuesday, June 19, 2018 at 4:53 PM
To: Jason Bagley <[REDACTED]>
Subject: In reference to the media inquiry: IMarketsLive's inappropriate income claims

Dear Mr. Bagley

I am sending you with attached to this email four documents in support of our Media Inquiry related to our company International Markets Live. Please, after you have had the chance to review them let me know if there are any further

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comments or need of support document you may need.

Cordially,

Frank J Gomez

Chief Operating Officer, iMarketsLive



[REDACTED]

[REDACTED]

From: Jason Bagley <[REDACTED]>
Date: Monday, June 11, 2018 at 8:29 AM
To: Frank J Gomez <[REDACTED]>
Subject: Re: MEDIA INQUIRY: iMarketsLive's inappropriate income claims

Hi Frank,

Thanks for the response. I have an appointment this morning but am available to talk this afternoon, after 2. I can also take the answers to my questions in writing. Tx.

On Thu, Jun 7, 2018 at 12:03 PM, Frank J Gome <[REDACTED]> wrote:

Dear Mr. Bagley,

We received your email and we will address each issue listed, however we will need 7-10 business days to communicate with both our Legal and Compliance departments so we can provide you with a proper reply. We appreciate allowing us this time to respond.

Cordially,

Frank J Gomez

Chief Operating Officer, iMarketsLive



[REDACTED]

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(646) 265-8593

----- Original Message -----

Subject: MEDIA INQUIRY: IMarketsLive's inappropriate income claims

From: Jason Bagley [REDACTED]

Date: Tue, June 05, 2018 4:40 pm

To: compliance@imarketslive.com

Hello,

I am a journalist at truthinadvertising.org, a national consumer advocacy organization and website. I am seeking comment in regard to more than 50 inappropriate income claims our organization has compiled by iMarketsLive, including from its CEO:
<https://www.truthinadvertising.org/wp-content/uploads/2018/04/ChrisTerryInstagram9.png>

Also, I have these questions in response to an investigation our organization conducted into IML's marketing:

Where is the IML income disclosure statement? A link to one in the compensation plan doesn't work.

Do most distributors make money? Do most distributors lose money?

Why should novice traders get involve in a notoriously risky market like forex?

Why isn't the need to hire a broker to make trades made more clear in IML's marketing?

For what reason is IML "unable to offer services" in 19 territories, as noted in its policies and procedures?

What is IML's response to being banned in Belgium, among other countries?

What is IML's response to consumer complaints to the FTC that allege it is a pyramid scheme?

What is IML's response to Wealth Generators' claims that it bribed its distributors and stole confidential information?

--

Jason Bagley

Staff Writer | www.truthinadvertising.org
475.882.9330



@TruthinAd | facebook.com/truthinad

--

Jason Bagley

Staff Writer | www.truthinadvertising.org
475.882.9330



@TruthinAd | facebook.com/truthinad

--

Jason Bagley

Staff Writer | www.truthinadvertising.org
475.882.9330



@TruthinAd | facebook.com/truthinad



Tina Report iML 7-9-18.pdf
119K

Memo

Date: 9-Jul-18

To: Frank Gomez
Christopher Terry
Troy Dooly

From: Donna Marie Serritella

RE: TINA Update

As of this morning, this is the current report from the TINA.org list.

| | |
|-----------------------|-----------|
| Total Removed: | 45 |
| Not Located: | 5 |
| Working Still: | 10 |

| TINA Income Claims Report iMarketsLive | | |
|---|---|---------------|
| https://www.truthinadvertising.org/imarketslive-income-database/ | | |
| | Link in Question | Status |
| 1 | AlexMorton6Figures | DOWN 7-1-18 |
| 2 | AlexMortonHousefortheParents | DOWN 7-1-18 |
| 3 | AlexMortonMakingMorethanParents | DOWN 7-1-18 |
| 4 | https://www.truthinadvertising.org/wp-content/uploads/2018/04/AlexMortonYacht.mp4 | DOWN 7-1-18 |
| 5 | https://www.truthinadvertising.org/wp-content/uploads/2018/04/BreakAway.mp4 | DOWN 7-1-18 |
| 6 | ChrisTerryInstagram1 | DOWN 7-1-18 |
| 7 | ChrisTerryInstagram2 | DOWN 7-1-18 |
| 8 | ChrisTerryInstagram3 | DOWN 7-1-18 |
| 9 | ChrisTerryInstagram4 | DOWN 7-1-18 |
| 10 | ChrisTerryInstagram5 | DOWN 7-1-18 |
| 11 | ChrisTerryInstagram6 | DOWN 7-1-18 |
| 12 | ChrisTerryInstagram7 | DOWN 7-1-18 |
| 13 | ChrisTerryInstagram8 | DOWN 7-1-18 |
| 14 | ChrisTerryInstagram9 | DOWN 7-1-18 |
| 15 | CompPlanVideo | DOWN 7-2-18 |
| 16 | DreamMaker | DOWN 7-2-18 |
| 17 | FinancialFreedom | DOWN 7-5-18 |
| 18 | iMarketsLiveBO1 | DOWN 7-5-18 |
| 19 | iMarketsLiveBO3 | DOWN 7-5-18 |
| 20 | iMarketsLiveBO4 | DOWN 7-5-18 |
| 21 | iMarketsLiveBO5 | DOWN 7-5-18 |

| TINA Income Claims Report iMarketsLive | | |
|---|---|--------------|
| https://www.truthinadvertising.org/imarketslive-income-database/ | | |
| | Link in Question | Status |
| 22 | iMarketsLiveIBO6 | DOWN 7-5-18 |
| 23 | iMarketsLiveIBO8 | DOWN 7-2-18 |
| 24 | iMarketsLiveIBO9 | DOWN 7-2-18 |
| 25 | iMarketsLiveIBO10 | DOWN 7-1-18 |
| 26 | iMarketsLiveIBO11 | DOWN 7-2-18 |
| 27 | iMarketsLiveIBO12 | DOWN 7-5-18 |
| 28 | iMarketsLiveIBO13 | DOWN 7-3-18 |
| 29 | iMarketsLiveIBO14 | DOWN 6-29-18 |
| 30 | iMarketsLiveIBO15 | DOWN 6-29-18 |
| 31 | iMarketsLiveIBO16 | DOWN 7-2-18 |
| 32 | iMarketsLiveIBO18 | DOWN 7-2-18 |
| 33 | iMarketsLiveIBO19 | DOWN 7-3-18 |
| 34 | iMarketsLiveIBO20 | DOWN 7-5-18 |
| 35 | iMarketsLiveIBO21 | DOWN 7-5-18 |
| 36 | iMarketsLiveIBO22 | DOWN 7-5-18 |
| 37 | iMarketsLiveIBO23 | DOWN 7-2-18 |
| 38 | iMarketsLiveIBO17 | DOWN 6-29-18 |
| 39 | ForTheHaters | DOWN 7-1-18 |
| 40 | GVApplication | DOWN 7-1-18 |
| 41 | GVWebsiteMainPage (Video Description) | DOWN 7-1-18 |
| 42 | MexicanMultiMillionaire | DOWN 7-1-18 |
| 43 | SecondHighestCheck | DOWN 7-1-18 |
| 44 | MexicanMultiMillionaire | DOWN 7-1-18 |
| 45 | SecondHighestCheck | DOWN 7-1-18 |

Attachment E

iMarketsLive (IML) Income Disclosure Statement for 1-1-18 thru 12-31-18

The Income Disclosure Statement is a reflection of iMarketsLive (IML) Opportunity. IML is committed to meeting all legal and compliance requirements in the Direct Selling industry. In order to protect the legal standing of IML, and protect our IBOs from making unsubstantiated income claims, we have developed the IML Income Disclosure Statement (IDS). The IML IDS is designed to display truthful information regarding the income generated from the IML Compensation Plan.

| Active IBO Rank | Average Days Worked Per Week | Numbers At This Rank | Average Active IBOs | 2018 Annual Income (U.S. dollars) | | |
|------------------------------------|------------------------------|----------------------|---------------------|-----------------------------------|-------------|-------------|
| | | | | High | Low | Average |
| Customers | | 64,136 | | | | |
| Total IBO | | 52,706 | 26,557 | | | |
| Paid as IBO Rank or Higher: | | | | | | |
| IBO Rank | * | 45,924 | 20,107 | \$1,125 | \$25 | \$52 |
| Platinum 150 | 2 | 3990 | 3733 | \$3,820 | \$3 | \$295 |
| Platinum 600 | 3 | 1661 | 1747 | \$39,199 | \$20 | \$1,376 |
| Platinum 1000 | 3 | 692 | 786 | \$27,089 | \$250 | \$4,558 |
| Platinum 2000 | 4 | 294 | 342 | \$40,610 | \$763 | \$12,521 |
| Platinum 5000 | 4 | 87 | 102 | \$70,125 | \$2,340 | \$33,542 |
| Chairman 10 | 5 | 34 | 50 | \$164,320 | \$13,245 | \$83,882 |
| Chairman 25 | 6 | 14 | 14 | \$327,768 | \$83,983 | \$187,688 |
| Chairman 50 | 6 | 6 | 8 | \$778,511 | \$208,470 | \$490,406 |
| Chairman 100 | 6 | 2 | 3 | \$1,537,968 | \$1,235,031 | \$1,379,267 |
| Chairman 250 | 7 | 2 | 1 | \$4,630,985 | \$1,537,968 | \$2,268,984 |
| Chairman 500 | 7 | 0 | 1 | \$5,559,633 | \$4,630,985 | \$5,095,309 |

*The average days worked per week is based on a survey of 89 IBOs. More numbers will be calculated as collect figures.

Income Disclaimer:

The earnings of IML IBO's in this chart are not necessarily representative of the income that a IML IBO will earn through participation in the IML Compensation Plan. IML does not pay commissions for recruiting new IBOs. Rather compensation is based solely on product sales, which varies. The figures in this chart should not be considered as guarantees of projections of your actual earnings or profits.

**The High is calculated by taking the total year for each rank plus the FOB requirement. The Low is one month of each rank plus the FOB requirement.

This document has been created for US IBO only

Attachment F

Consumer News

iMarketsLive Financial Document Debunks Income Claims

MLM's long awaited income disclosure statement, while confusing, packs some hard truths.

Aug 15, 2019 | Updated September 25, 2020



Editor's Note: Updates have been posted at the end of this article.

For almost a year, a link to iMarketsLive's income disclosure statement didn't work. The financial document had become "obsolete," the forex trading told TINA.org in June 2018, so the company had it removed from its website. That meant that the only available information about what current and prospective distributors might expect to earn as an "independent business owner" with IML was coming directly from the company's management team and distributors. And according to many at the top of IML, distributors were living the life of their dreams.

When a new income disclosure statement was unveiled in April 2019, one thing became clear: 95 percent of IML distributors had averaged an income of less than \$300 in 2018 — not exactly killing it. (Not to mention this figure

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doesn't account for expenses, including, but not limited to, any monthly costs required to earn commissions.) And while there's a whole lot wrong with the financial document, this much is certain: claims of wealth, time freedom and prosperity are inappropriate and misleading.

How to sum up the iMarketsLive 2018 income disclosure statement? Confusing — to say the least. For example, there is a different high, low and average annual income for Chairman 500, which would make sense if there were more than one person at that level, the highest rank in the IML compensation plan. But there is not. So the high, low and average should all be the same.

What else? There is a column titled “Numbers At This Rank” and a column titled “Average Active IBOs,” with no indication of how IML is distinguishing these two categories of distributors. One might think that “Numbers At This Rank” would be a more inclusive group than “Average Active IBOs.” But for the majority of ranks, the number of “Average Active IBOs” is greater than the figure in the “Numbers At This Rank” column. This includes Chairman 500, which somehow has one “Average Active IBO” despite having zero people at the rank, according to the “Numbers At This Rank” column.

| Active IBO Rank | Average Days Worked Per Week | Numbers At This Rank | Average Active IBOs | 2018 Annual Income (U.S. dollars) | | |
|------------------------------------|------------------------------|----------------------|---------------------|-----------------------------------|-------------|-------------|
| | | | | High | Low | Average |
| Customers | | 64,136 | | | | |
| Total IBO | | 52,706 | 26,557 | | | |
| Paid as IBO Rank or Higher: | | | | | | |
| IBO Rank | * | 45,924 | 20,107 | \$1,125 | \$25 | \$52 |
| Platinum 150 | 2 | 3990 | 3733 | \$3,820 | \$3 | \$295 |
| Platinum 600 | 3 | 1661 | 1747 | \$39,199 | \$20 | \$1,376 |
| Platinum 1000 | 3 | 692 | 786 | \$27,089 | \$250 | \$4,558 |
| Platinum 2000 | 4 | 294 | 342 | \$40,610 | \$763 | \$12,521 |
| Platinum 5000 | 4 | 87 | 102 | \$70,125 | \$2,340 | \$33,542 |
| Chairman 10 | 5 | 34 | 50 | \$164,320 | \$13,245 | \$83,882 |
| Chairman 25 | 6 | 14 | 14 | \$327,768 | \$83,983 | \$187,688 |
| Chairman 50 | 6 | 6 | 8 | \$778,511 | \$208,470 | \$490,406 |
| Chairman 100 | 6 | 2 | 3 | \$1,537,968 | \$1,235,031 | \$1,379,267 |
| Chairman 250 | 7 | 2 | 1 | \$4,630,985 | \$1,537,968 | \$2,268,984 |
| Chairman 500 | 7 | 0 | 1 | \$5,559,633 | \$4,630,985 | \$5,095,309 |

Oh, and IML didn't even bother to run a spellcheck: “The IML IDS is designed to display trughful information regarding the income generated from the IML Compensation Plan,” the company states in the document. Perhaps a Freudian slip?

TINA.org first inquired about the missing income disclosure statement last year as part of an investigation into the marketing of the IML “opportunity” that uncovered dozens of inappropriate income claims. While the vast majority of those claims have been taken down, a new sampling by TINA.org picks up right where the 2018 investigation left off, adding almost 100 deceptive earnings claims to the pile. This time around, TINA.org focused on some of IML's top-earning distributors, including Ivan Tapia, Austin Godsey, Alex Morton, David Imonitie, Allan Badilla, Jason Brown and Matthew Rosa.



Fun fact about Godsey and Morton: They were also featured in TINA.org's 2018 investigation.

Godsey removed several posts containing inappropriate income claims, along with the phrase "7 Figure Earner," from an Instagram account, @workwithaustingodsey, that he hasn't posted on since March 2018. "Austin now understands the gravity of posting 'out of this world' claims and there is no excuse for it," then-IML Chief Operating Officer Frank Gomez told TINA.org in June 2018. In fact, Godsey has only become more emboldened, making exaggerated earnings claims on another Insta account, @imaustingodsey. He has also apparently enrolled his 5 year old son as a distributor in violation of Section 2.2 of IML's Policies & Procedures, "Becoming An IBO," which states that applicants must be 18 or older. In January, Godsey announced that his young son cracked Chairman 100 in an Instagram post that included a photo of dad sitting next to IML CEO Christopher Terry.

And what did Morton receive for his punishment for making inappropriate income claims last year? A promotion from vice president of sales to executive vice president. Morton likes to posts photos of himself in, on or near his Rolls Royce, and can frequently be seen on Instagram wearing more gold chains than Mr. T. Of note, while Morton claims in one of the posts above that there are

more than 178 six to eight figure earners, the income disclosure statement appears to indicate that there are likely less than 50.

Current IML COO Kyle Lowe did not respond to a request for comment on this article. Nor did Troy Dooly, who Lowe said in a previous email was “overseeing” the latest version of the income disclosure statement. In [a 2016 interview](#) with Terry, the CEO, Dooly seemed very impressed with IML. Soon after the 2018 income disclosure statement was completed, Dooly parted with IML, [citing](#) “unethical principles.”

Find more of our coverage on IML [here](#).

UPDATES

9/25/20: The Direct Selling Self-Regulatory Council (DSSRC) has issued a [case decision](#) based on a [TINA.org complaint](#) finding that iMarketsLive and its distributors were making inappropriate income claims to promote the company’s business opportunity. The DSSRC recommended that the company “engage in effective training and monitoring of its IBOs (distributors) and use appropriate enforcement procedures to provide reasonable assurance that earnings claims made by its IBOs are substantiated, contain appropriate disclosures and are not misleading.”

1/10/20: iMarketsLive has a new website and a new name: [IM Mastery Academy](#).

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Consumer News

5 Ad Trends to Be Wary of in 2021

From fairwashing to fragrance, consumers have plenty to watch out for in 2021.



Consumer News

IM Mastery Academy Can't Outrun Foreign Financial Actions

A name change is unlikely to alter the fact that this forex trading MLM is not welcome in several countries.



Consumer News

How MLMs Exploit Consumers During a Pandemic

Deceptive earnings claims edition.



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Attachment G



Laura Smith [REDACTED]

Illegal Income Claims by iMarketsLive

Lara Smith [REDACTED]

Thu, Dec 5, 2019 at 10:50 AM

To: Peter Marinello [REDACTED], Howard Smith [REDACTED]
Cc: Bonnie Patten [REDACTED]

Peter, Howard,

Please see the attached letter regarding iMarketsLive. We'll get a hardcopy and flashdrive in the mail to you as well.

If you have any questions, please don't hesitate to let us know.

Best,

Laura

Laura Smith
Legal Director

[REDACTED]
truthinadvertising.org | [@TruthInAd](https://twitter.com/TruthInAd) | facebook.com/truthinad

Keeping
Ads
Honest



 12_5_19 letter to DSSRC re iMarketsLive.pdf
6603K



December 5, 2019

Peter C. Marinello, Director
Howard J. Smith, Attorney
Direct Selling Self-Regulatory Council
112 Madison Avenue, 3rd Floor
New York, NY 10016
[REDACTED]

Re: Illegal Income Claims by iMarketsLive

Dear Peter and Howard:

We write to file a complaint with the Direct Selling Self-Regulatory Council against International Markets Live, Inc. (hereinafter “iMarketsLive”), a New York-based multi-level marketing company that sells Forex and cryptocurrency trading software and educational products, and uses unsubstantiated and exaggerated income claims to market its business opportunity.¹

Specifically, iMarketsLive (led by its CEO Chris Terry since 2013) and its distributors have claimed – and continue to claim – that participants make five-figures per month and millions of dollars per year, travel the world, and buy luxury vehicles and

¹ iMarketsLive has been the subject of more than 100 complaints to the BBB, which currently gives the company an F rating, as well as numerous complaints to the FTC concerning difficulties with cancellations and refunds, brash and deceitful distributors, and pyramid scheme accusations. See <https://www.bbb.org/us/ny/new-york/profile/online-trading-school/imarketslive-0121-161238>; <https://www.truthinadvertising.org/what-you-should-know-about-imarketslive/>; <https://www.truthinadvertising.org/wp-content/uploads/2018/05/2018-00782-REDACTED-Complaints.pdf>.

other expensive items, among other things. Such claims completely contradict iMarketsLive's 2018 Income Disclosure Statement, which indicates that the vast majority of the company's distributors – 95 percent – averaged an income of less than \$300 in 2018, and that is without accounting for expenses, including, but not limited to, any monthly costs required to earn commissions.²

That same year, TINA.org collected more than 50 examples of exaggerated income claims made by CEO Chris Terry, top distributors such as Jason Brown and Alex Morton,³ and others, and contacted the company for comment. At that time, the company, through its then Chief Operating Officer Frank Gomez, stated it “absolutely agree[d] that unrealistic income claims, as well as any income claims on social media is not good,” that all iMarketsLive distributors would “be trained with ‘Do’s and Don’ts’ in regard to any social media posts,” and that Alex Morton and Chris Terry in particular “ha[d] made errors in comments or posts from the past, ha[d] been notified to eliminate any communication that is considered any type of income claims.”⁴

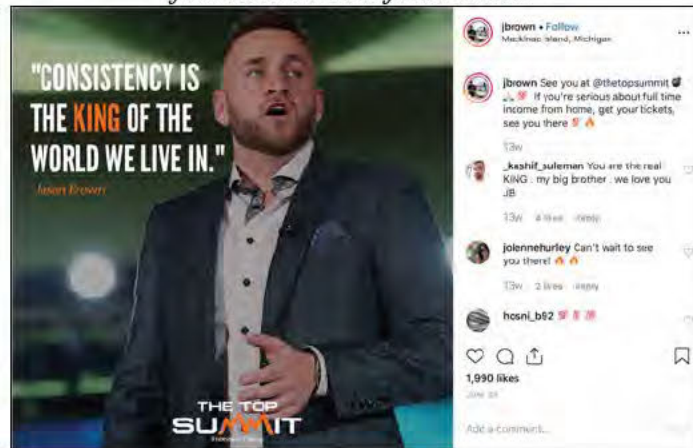
² See iMarketsLive 2018 Income Disclosure Statement, <https://www.truthinadvertising.org/wp-content/uploads/2019/08/iMarketsLive-2018-Income-Disclosure-Statement.pdf>; iMarketsLive Financial Document Debunks Income Claims, Aug. 15, 2019, <https://www.truthinadvertising.org/imarketlive-financial-document-debunks-income-claims/>.

³ Alex Morton was formerly a top distributor for Vemma Nutrition Company, which reached a \$238 million settlement with the Federal Trade Commission over allegations that it was a pyramid scheme in 2016. In fact, he was one of the FTC's key witnesses against Vemma at the preliminary injunction hearing as the FTC showed a video of Morton making inappropriate income claims. Interestingly, just before the FTC sued Vemma, Morton left the company and moved to Jeunesse Global, where he continued to make inappropriate income claims. See TINA.org's Jeunesse Income Claims Database, <https://www.truthinadvertising.org/jeunesse-income-claims-database/>. Then, in July 2016, a class-action lawsuit was filed against Jeunesse – and naming Morton as a defendant and co-conspirator – alleging it was a pyramid scheme. Morton signed-up with IML the very next month.

⁴ See June 18, 2018 statement from iMarketsLive, https://www.truthinadvertising.org/wp-content/uploads/2019/12/6_18_18-iMarketLive-statement.pdf.

While the company removed a majority of the examples of inappropriate income claims in TINA.org's 2018 sampling, TINA.org has since collected more than 200 additional examples of exaggerated income claims, making it clear that iMarketsLive was simply paying lip service to truthful marketing and did not properly or fully address the issue.⁵ Examples of inappropriate income claims that remain on the internet today are:

*"full time income from home"*⁶



*"an extra \$10,000 a month residually!"*⁷



⁵ All 250+ examples of iMarketsLive's unsubstantiated income claims are available at <https://www.truthinadvertising.org/imarketslive-income-database/> and on the enclosed flash drive. As of November 2019, 140 of these examples remain in publication.

⁶ <https://www.instagram.com/p/BzTWD9WhhgQ/>.

⁷ <https://www.instagram.com/p/B4AUMGsnRW/>.

“\$25,000-\$30,000/MONTHLY”⁸



“THE MONEY IS THERE wether [sic] I'm there or not”⁹



The above excerpts and images are typical of the more than 250 examples of iMarketsLive marketing materials that make exaggerated and deceptive income claims, many of which also appear in social media videos.

In short, iMarketsLive was put on notice of this serious deceptive marketing issue well over a year ago, admitted that deceptive earnings claims are unacceptable, and vowed to correct the issue and train its distributors. Nevertheless, it continues to deceive consumers with outrageous income claims. As such, TINA.org strongly urges the DSSRC

⁸ <https://www.instagram.com/p/B3A0FuLDpx/>.

⁹ <https://www.instagram.com/p/B5krmnHfY3Z/>.

to review the claims being made by iMarketsLive and its distributors and take appropriate action.

If you have any questions, please do not hesitate to contact us.

Sincerely,



Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.
Encl.



Bonnie Patten, Esq.
Executive Director
Truth in Advertising, Inc.

Attachment H



Laura Smith [REDACTED]

Fwd: IM Request for information

[REDACTED]

----- Forwarded message -----

From: **Kyle Lowe** [REDACTED]
Date: Fri, Mar 13, 2020 at 9:32 AM
Subject: IM Request for information
To: [REDACTED]
Cc: Dawn Dion [REDACTED] Kyle Lowe [REDACTED]

Dear Mr Bagley,

iMarketsLive's compliance department is currently working to remove all income claims by our representatives that are recorded on your database.

In order to insure all claims have been removed, Are you able to supply us with the live URL links for these claims in your database? We currently only have access to them from the screenshots on your server.

We appreciate any assistance in this matter as we work to have these all removed immediately.

Thank you for your cooperation as we try to clean this up 100%.

Sincerely,

Kyle Lowe

COO - Chief Operating Officer

iMarketsLive™

International Markets Live Inc.

IML

"What will you *become*."

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--

Jason Bagley

Staff Writer | www.truthinadvertising.org



@TruthinAd | facebook.com/truthinad

Attachment I



Laura Smith [REDACTED]

Fwd: IM Request for information

Lara Smith [REDACTED]

Mon, Mar 16, 2020 at 10:10 PM

To: [REDACTED]

Bcc: Bonnie Patten [REDACTED]

Kyle,

Your email below was forwarded to my attention. Attached is a list of the URLs that correspond to the entries in the [iMarketsLive Income Claims Database](#) published on TINA.org. We are providing this information to you to help expedite the removal of deceptive marketing materials from the internet but please note that this is not a finite list of marketing materials that need immediate attention, but rather merely a sampling that is indicative of a widespread issue. In other words, a thorough review of iMarketsLive marketing materials will still be necessary.

If you have any questions, please let me know.

Laura

Laura Smith
Legal Director

[REDACTED]
truthinadvertising.org | [@TruthinAd](https://twitter.com/TruthinAd) | facebook.com/truthinad

Keeping
Ads
Honest



[Quoted text hidden]



iMarketsLive Income Claims Database_URLs.pdf
63K

TINA.org's iMarketsLive Income Claims Database: URLs**2018**

1. <http://www.imarketslive.com/>
2. [http://www.myimarketslive.co/Final IML Comp 5 \(1\).pdf](http://www.myimarketslive.co/Final IML Comp 5 (1).pdf)
3. <https://www.youtube.com/watch?v=LRHt9--p9yc>
4. <https://www.youtube.com/watch?v=6G1m0f14rug>
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Attachment J



Laura Smith [REDACTED]

FW: International Markets Live, Inc. - Response to "Challenge" by TINA

Howard Smith [REDACTED] Wed, Apr 29, 2020 at 3:28 PM
To: Laura Smith [REDACTED]
Cc: Peter Marinello [REDACTED], Joanne Li [REDACTED], Bonnie Patten [REDACTED]

Laura:

Please see the attached response from the Company. We just today received confirmation that the Company was not intending on designating any portion of the response as confidential and so are forwarding it to you know. We kindly request your written response on or before May 14.

Best regards and stay safe,

Howard

Howard J. Smith
112 Madison Avenue, 3rd Floor
New York, NY 10016



<http://www.bbbnp.org/>

-

**Direct Selling
Self-Regulatory Council
(DSSRC)**

A division of **BBB National Programs, Inc.**

-

Please note my new email address: [REDACTED]

From: JT Moran III [REDACTED]
Sent: Wednesday, April 8, 2020 3:21 PM
T: A Howard Smith [REDACTED]; Peter Marinello [REDACTED]
Cc: Stacy Ewing [REDACTED]; Kle Loe [REDACTED]; Brandon Scott [REDACTED]
[REDACTED]; Daniel Ade [REDACTED]; Pat Davison [REDACTED]

PX17

000952

[REDACTED]
Subject: International Markets Live, Inc. - Response to "Challenge" by TINA

April 8, 2020

VIA E-MAIL ONLY

Attorney Howard J. Smith

Direct Selling Self-Regulatory Council

A Division of BBB National Programs, Inc.

112 Madison Avenue, 3rd Floor

New York, NY 10016

[REDACTED]

RE:

International Markets Live, Inc. - Response to "Challenge"

Our File No.:

IML39884.BBB.DSSRC

Dear Mr. Marinello & Attorney Smith,

Sometime during the end of calendar year 2019, the Direct Selling Self-Regulatory Council, a Division of BBB National Programs, Inc. (hereinafter referred to as "DSSRC"), received a complaint and/or "challenge" from Truth in Advertising, Inc. (hereinafter referred to as "TINA") regarding the allegation of "Illegal Income Claims by iMarketsLive" or International Markets Live, Inc. (hereinafter referred to as "Company"). Thereafter, Company received the correspondence at issue from DSSRC, inquiring about direct selling advertising claims that appear to have been disseminated online and on social media. The Company made contact through legal counsel with both Director Peter Marinello and DSSRC Attorney Howard Smith wherein a conversation ensued with regard to the claims made by TINA. Director Marinello and Attorney Smith made reference to the Company's representations and messaging concerning the business opportunity it offers, including earning claims, that are alleged to convey an untruthful and/or misleading message - possibly deceptive - in violation of Section 5 of the FTC Act. As part and parcel of the DSSRC's self-regulatory efforts to ensure truth and accuracy in the marketplace, the Company has been asked to provide "substantiation" for same and alleged claims. We respectfully ask that the following be considered a timely response thereto/hereto.

As noted in our March 25, 2020, correspondence, we want to reiterate our appreciation of your commitment to the industry and, of course, share your "Mission" to *"enhance consumer confidence in direct selling advertising and marketing by providing assurance that direct selling earnings and product claims that are communicated in direct selling advertising and marketing are truthful, accurate, disclose information material to consumers and have the necessary evidentiary support (emphasis added)*. Company has reviewed the DSSRC Policies and Procedures found on your HTTP site. In addition, Company has sought assistance from the Federal Trade Commission via its index of Commission-issued guidance documents, specifically, "Business Guidance Concerning Multi-Level Marketing," Question No. 13 - How should an MLM approach representation to current and prospective participants? The Company has been vigilant in monitoring social media and on-line postings - whether accolades or that which could reflect negatively on the reputation of the business. But much

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of the the Company's ongoing priorities have been geared toward and focused upon the application of consumer protection principles to its business practices, especially in the legal realm or legal department for which I oversee.

In January of 2019, the Company updated the "Statement of Policies & Procedures" and further defined its own "Mutual Commitment Statement" (or Mission Statement), recognizing the importance of developing long-term and mutually rewarding relationships between it and its IBO's while in the same vein acknowledging and respecting the nature of relationship and support for the ultimate consumer or customer. For instance, the Company expressly commits to providing prompt, professional and courteous personal service and communications to all [Section 1.1(a)(i)] and, in return, the Company fully expects its IBO's conduct themselves in a professional, honest, and considerate manner [Section 1.1(b)(i)] and, of course, not make exaggerated income or service claims [Section 1.1(b)(iv)]. In addition, the Company subscribes to a "Code of Ethics" whereby it fully expects its IBO's to be honest, responsible, professional and conduct themselves with integrity but also to not make any statement that unreasonably offend, mislead or coerce others [Section 1.2(c)(iv)]. And rest assured that should an IBO's conduct be detrimental, disruptive, or injurious to the Company or others, it has the express authority and will take appropriate action whenever necessary [Section 1.2(d) & Section 7.0]. Lastly, the Company's "Terms & Conditions" can be found on its website (<http://im.academy>). Section 4.03 provides for the termination of an IBO for "violating the terms of his or her Agreement, which includes these Policies and Procedures, Terms and Conditions," among others, discussed above.

Next, and as a result of the DSSRC's notification, the Company disseminated an "Important Notice" to remind and, further, educate and inform our IBO's and/or our Membership of the significance and importance of strict compliance with the Company's Statement of Policies & Procedures. I have attached a copy of this Notice for your review, perusal and consideration. I hope you notice the earnestness for which the Company takes its obligations and responsibilities to its Membership but also and most importantly its application of core consumer protection principles to its business practices. We at the Company will continue to be proactive and diligent with regard to all business activities and endeavors, especially within your particular lane.

And finally, the Company's Compliance Department has moved *post haste* to remove, delete and/or redact any and all "claims," I believe with the exception of a few that could not be removed, were terminated, suspended or that the Company was unable to discern and/or locate. I have attached a copy of "Spreadsheet" for your review, perusal and consideration.

https://docs.google.com/spreadsheets/d/1XCh54_1d1FCMfDN6vQ4YaDgKJ-y2n2oxlr8B-bFHEgM/edit#gid=0

We at the Company enjoy the opportunities and privilege to do business in the United States and all over the world. We have worked tirelessly to create a "win-win" for all those interested. We have done such on a level playing field and we have gotten ahead by hard work and perseverance. I hope this correspondence finds you well and I am optimistic that once acquainted with the true essence of the IM Mastery Academy or the Company you too will understand the benefit provided all those interested in earning a better quality of life through education and knowledge.

Please contact me personally and should you have any further questions and/or concerns and/or thoughts with regard to this matter:

John T. Moran III, ESQ.

MORANGROUP

7301 Peak Drive, Suite 150

Las Vegas, Neadad 89128

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Direct:

[REDACTED]

Mobile:

[REDACTED]

Main:

[REDACTED]

Facsimile:

[REDACTED]

Email:

[REDACTED]

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IM-comm_2020-03-19.pdf

1196K



Help



IM Comm - Policies & Procedures 2020-03-19

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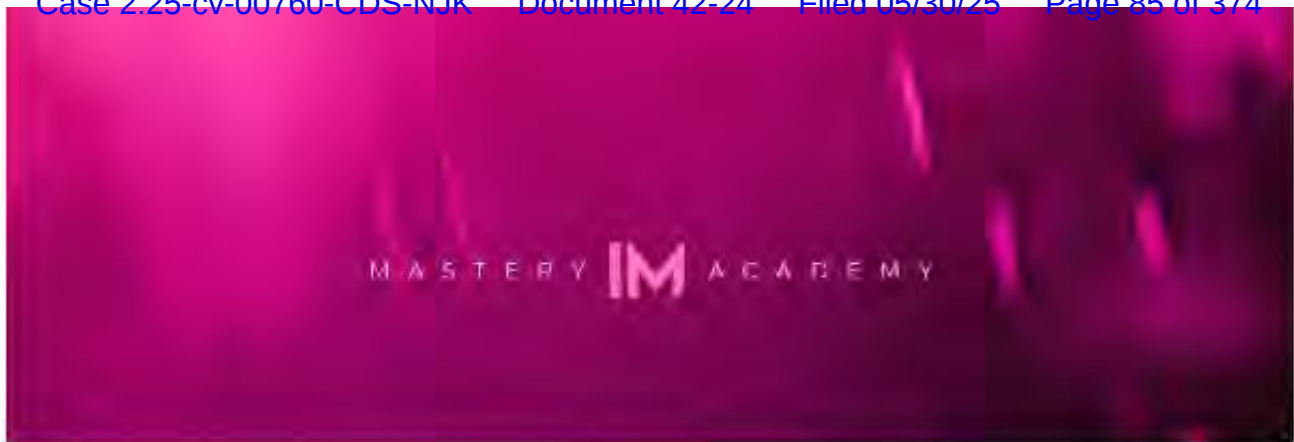
IMPORTANT NOTICE

regarding increased regulation
within the industry. here's what
you need to know as an IBO.

details below

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Hello IM academy™ members,

Recently the industry has become the subject to increased regulation and scrutiny. Because of this, we all need to help each other become vigilant and strict in complying with any of these concerns.

In today's environment, the following statements below could be characterized as - "the making or posting" of false & misleading earning claims.

Accordingly, we must act quickly & deliberately to avoid & eliminate any marketing practices that could in any way, shape or form be considered false, misleading or even deceptive. Here are a few examples:

"full time income from home"

"an extra \$10,000 a month residually!"

"25,000-\$30,000/MONTHLY"

"Sick or not, THE MONEY IS THERE"

We ask that you immediately remove any earnings or income claims that may violate the **IM academy™ Statement of Policies & Procedures**.

Should these types of claims not be removed, the IM academy™ Legal Department under section 7.0 will be forced to take Disciplinary Action.

IM academy™ is here to support you in your future and business endeavors. We appreciate your hard work, tenacity and attention to detail. Please be mindful of the serious nature of this situation and make the necessary changes to bring your business activities into strict compliance with the companies

Statement of Policies & Procedures

Below is a particular section ready for you to review.

Click below right here to refresh yourself on all these policies:

im.academy/policies

Thank you for your cooperation.

POLICIES & PROCEDURES

1.2 Mutual Commitment Section

In the spirit of mutual respect and understanding, IM is committed to:

- Provide prompt, professional and courteous personal service and communications to all of its IBOs and Customers;
- Provide the highest level of quality services, at fair and reasonable prices;
- Exchange or refund the purchase price of any product, service or membership as provided in our return policies contained herein;
- Deliver services promptly and accurately;
- Pay earned commissions accurately and on a timely basis;
- Expedite orders if an error or unreasonable delay occurs;
- Roll out new services and programs with IBOs input and planning;
- Implement changes in the Compensation Plan or Policies and Procedures that affect the IBOs with input from the IBOs (note: such changes will be effective thirty (30) days after the date it was published);
- Support, protect and defend the integrity of the IM Income Opportunity;
- Offer IBOs an opportunity to grow with IM with such growth guided by the principles of Servant Leadership.

In return, IM expects that its IBOs will:

- Conduct themselves in a professional, honest, and considerate manner;
- Present IM Corporate and services information in an accurate and professional manner;
- Present the Compensation Plan, services and refund policies;

- contained herein in a complete and accurate manner;
- Not make exaggerated income or service claims;
- Make reasonable effort(s) to support and train other IBOs and Customers in their sales and marketing organization;
- Not engage in cross-line sponsoring, solicitation of competing services, unhealthy competition or unethical business practices;
- Provide positive guidance and training to IM IBOs and Customers in their sales and marketing organizations while exercising caution to avoid interference with other IBO sales and marketing organizations. As such, an IBO is discouraged from providing training to other IBOs or Customers in a different sales and marketing organization;
- Support, protect, and defend the integrity of the IM Income Opportunity;



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You are subscribed and active on imarketslive.com

Our mailing address is:

imarketslive™
520 White Plains Road
Tarrytown, NY 10591

[Add us to your address book](#)

Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe from this list](#).



Attachment K



Laura Smith [REDACTED]

FW: International Markets Live, Inc. - Response to "Challenge" by TINA

Lara Smith [REDACTED]

Tue, May 12, 2020 at 12:02 PM

To: Howard Smith [REDACTED], Peter Marinello [REDACTED]

Cc: Joanne Li [REDACTED], Bonnie Patten [REDACTED]

Howard, Peter,

Please see the attached letter and, as always, let us know if you have any questions.

Best,

Laura

Laura Smith
Legal Director

[REDACTED]
truthinadvertising.org | [@TruthinAd](https://twitter.com/TruthinAd) | facebook.com/truthinad

Keeping
Ads
Honest



On Wed, Apr 29, 2020 at 3:28 PM Howard Smith [REDACTED] wrote:

[Quoted text hidden]

5_12_20 ltr to DSSRC re IML.pdf
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May 12, 2020

VIA EMAIL

Peter C. Marinello, Director
Howard J. Smith, Attorney
Direct Selling Self-Regulatory Council



Re: TINA.org's response to iMarketsLive' April 8, 2020 Letter to DSSRC

Dear Peter and Howard:

International Markets Live, Inc. (iMarketsLive)'s April 8, 2020 letter makes clear that it does not dispute the fact that a multitude of unsubstantiated and deceptive marketing claims have been (and are being) used to market its products and business opportunity.¹ Instead, the company goes to great lengths to describe its business structure, compliance training, distributor support system, and ongoing monitoring to show that its distributors are properly educated and that it has a robust system in place to ensure the legality of its marketing claims. Unfortunately, these efforts have not addressed the issue at hand.

For years, iMarketsLive has turned a blind eye to deceptive income claims being used to promote its business opportunity, as evidenced by the fact that TINA.org collected more than 200 examples of such claims *after* its then Chief Operating Officer Frank Gomez acknowledged the existence of "unrealistic" income claims being made by its distributors and vowed to train them on the "Do's and Don'ts" of marketing on social

media.² Further, after receiving iMarketsLive’s April 8, 2020 letter, and in less than an hour, TINA.org collected more than a dozen new examples of iMarketsLive distributors making deceptive income claims – all of which were published *after* iMarketsLive sent its April letter to the DSSRC vowing that it “has been vigilant in monitoring social media and on-line postings.”³

Such findings make it clear that whatever tactics iMarketsLive is using to ensure that its distributors adhere to FTC law are not working. Moreover, the solution cannot be for TINA.org to engage in a never-ending game of whack-a-mole with this company.

iMarketsLive needs to do better. It must thoroughly examine all of its marketing materials (including those of its distributors), as well as its training, oversight, and enforcement mechanisms, to ensure that the deception created by iMarketsLive to date is fully eradicated, as well as ensure the truthfulness and legality of marketing claims going forward.

Further, iMarketsLive’s recitation of its company policies raise serious concerns with respect to its income claim training of its distributors (assuming iMarketsLive quoted the totality of its guidance on these issues). Specifically, according to iMarketsLive’s letter, the company informs its distributors that they must “conduct themselves in a professional, honest, and considerate manner” and may not make “exaggerated income or service claims.” While this is true, the policies – as stated in the letter – are incomplete. In addition to being required to be honest and prohibited from making exaggerated income claims, iMarketsLive and its distributors are also prohibited by law from depicting results that are not “representative of what consumers will generally achieve,”⁴ *even if* the statements are honest and not exaggerated. In other

words, a successful top distributor is not permitted to make honest claims that they earn thousands of dollars a month, for example, as that is not representative of what a typical distributor makes. But iMarketsLive's April 8th letter is silent on this additional key restriction.

In short, iMarketsLive's efforts at eradicating its ongoing and widespread deceptive marketing are not working. Meanwhile, consumers continue to be deceived.

If you have any questions, please do not hesitate to contact us.

Sincerely,



Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

¹ It appears that the company has recently changed its name to IM Master Academy. *See* <https://www.imarketslive.com/>.

² *See* June 18, 2018 statement from iMarketsLive, https://www.truthinadvertising.org/wp-content/uploads/2019/12/6_18_18-iMarketLive-statement.pdf.

³ Below are additional examples of deceptive income claims being used to market the iMarketsLive business opportunity:

https://www.instagram.com/p/B_2hiqolXFt/;
https://www.instagram.com/p/B_2aU6SF3Yn/;
https://www.instagram.com/p/B_sM8ybFJov/;
https://www.instagram.com/p/B_TCVkxl0rN/;
https://www.instagram.com/p/B_Xt8EspAtv/;
https://www.instagram.com/p/B_csc7JpppE/;
https://www.instagram.com/p/B_x1WRZJXWr/;
https://www.instagram.com/p/B_TZFIJpHNv/;
https://www.instagram.com/p/B_2ro_KndO7/;
https://www.instagram.com/p/B_upFEUIX5s/;
https://www.instagram.com/p/B_2qZeKAwp7/;
https://twitter.com/luc_longmire/status/1253658600318304257;
https://twitter.com/Chuks_EO/status/1251248039903342592.

⁴ *See* FTC Guides Concerning the Use of Endorsements and Testimonials in Advertising, [16 CFR 255.2](#).

Attachment L



Laura Smith [REDACTED]

FW: International Markets Live Inc. - Reply to TINA Supplemental (DSSRC)

Howard Smith [REDACTED]

Wed, Jul 1, 2020 at 1:06 PM

To: Laura Smith [REDACTED]

Cc: Peter Marinello [REDACTED] Joanne Li [REDACTED]

Laura:

We hope you are doing well.

For your records, please see below the final company response from iMarkets Live. [REDACTED]

[REDACTED]

Best regards,

Howard

From: JT Moran III [REDACTED]

Sent: Wednesday, June 17, 2020 7:41 PM

To: Howard Smith [REDACTED]

Cc: Peter Marinello [REDACTED]; Stacy Ewing [REDACTED]

Subject: International Markets Live Inc. - Reply to TINA Supplemental (DSSRC)

June 17, 2020

VIA E-MAIL ONLY

Attorney Howard J. Smith

Direct Selling Self-Regulatory Council

A Division of BBB National Programs, Inc.

112 Madison Avenue, 3rd Floor

New York, NY 10016

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RE:

International Markets Live, Inc. - Response to "Challenge"

Our File No.: IML.39884.BBB.DSSRC

Dear Mr. P. Marinello & Attorney H. Smith,

First and foremost, let me thank both you and the Direct Selling Self-Regulatory Council (hereinafter referred to as "DSSRC") for the additional time provided for which to formulate a response to the May 12th, 2020, correspondence forwarded to your attention from Truth in Advertising, Inc. (hereinafter referred to as "TINA").

As you know, the DSSRC received a complaint and/or "challenge" from TINA regarding the allegation of "Illegal Income Claims by iMarketsLive" or International Markets Live Inc. (hereinafter referred to as "Company") sometime toward the end of calendar year 2019. Thereafter, the Company received correspondence from the DSSRC, inquiring about these particular direct selling advertising claims that appear to have been disseminated online and on social media. The DSSRC made inquiry and asked that the Company reply. Accordingly and on April 8th, 2020, the Company proceeded to dispute in writing the claims and/or "complaint" made by TINA in their entirety and reiterated to the DSSRC its focus on the importance of core consumer protection to the industry, its consumers and itself. The Company confirmed: (1) its commitment to ensure truth and accuracy in the marketplace; (2) its alignment with the DSSRC's Policies & Procedures, particularly as same relate to the enhancement of consumer confidence in direct selling advertising and marketing; and (3) its integration of a much more robust compliance program - inclusive of but not limited to careful monitoring and early detection, proactive avoidance and immediate action, concurrent with continued and regular company-wide education - so as to prevent messaging that could in any way, shape or form be viewed as false, deceptive and/or misleading. Thereafter, the DSSRC received a supplemental response from TINA, dated May 12, 2020, and likewise, this correspondence shall serve as a timely response by the Company thereto.

While the Company respects and appreciates the work of TINA and, specifically, its protection of consumers against false advertising and deceptive marketing practices, the Company simply must agree to disagree with TINA's opinions, characterizations, allegations and claims made about and against the Company.

- The Company has not "turned a blind eye to deceptive income claims being used to promote its business opportunity," rather it has implemented a rigorous compliance plan and correspondent committee that meets regularly and routinely.
- To suggest that our then COO Frank Gomez "acknowledged the existence of 'unrealistic' income claims" is disingenuous and not an accurate representation of remarks made in his June 18, 2018, correspondence prepared on behalf of the Company. I hope that you review TINA's correspondence in detail and discern for yourself.
- The Company does business with many folks all over the world and has made it a priority to communicate reminders and updates to its Policies & Procedures and Terms of Use and will continue these efforts, uninterrupted, and despite the pessimistic forecasts made by TINA. In fact, the Company is in the process of detailing and scheduling a live seminar that will include a virtual room for discussions about "earnings claims" and the dangers thereof.
- TINA claims that "iMarketsLive needs to do better . . . to ensure that the deception created by iMarketsLive to date is fully eradicated." Simply put, every business can and should always strive to be better and do better. Certainly, this Company works tirelessly to better protect consumers and the marketplace in general.

And finally, TINA makes reference to the FTC's "Guides Concerning the Use of Endorsements and Testimonials in Advertisement" [Consumer Endorsements: 16 CFR Part 255.2(b)], wherein a Company is prohibited by law from depicting results that are not "representative of what consumers will generally achieve" and the Company's failure to make representations thereto. One, silence should not be viewed as an omission by the Company to fully know of and understand its regulatory obligations and responsibilities to the industry and in the realm for which it has the privilege to operate. Rest assured, the Company will continue

working hard to create the very best consumer experience; whether being mindful and cautious of the things it is prohibited from doing or with regard to those things it does very well and to the benefit of all those interested.

Again, the Company has reviewed the the DSSRC Policies and Procedures found on your HTTP site. In addition, the Company continues to seek assistance from the Federal Trade Commission via its index of Commission-issued guidance documents, specifically, "Business Guidance Concerning Multi-Level Marketing," Question No. 13 - How should an MLM approach representation to current and prospective participants? To reiterate, the Company will continue daily monitoring of social media and on-line postings and, of course, take action where necessary and consistent and compatible with FTC mandates and guidelines. And the Company plans to reach out to Ms. Laura Smith, Esq., Legal Director, for TINA, upon the conclusion of this disputed matter, to "build a bridge" or strategic partnership moving forward. The Company has found through communication, conversation and dialogue, anything can be accomplished. We fully appreciate the efforts of TINA and as expressed above. The Company is quite certain that it can learn much from TINA and, likewise, TINA can learn much about the Company - all of which can come from a meaningful conversation or series thereof.

We stand ready, willing and able to discuss any future inquiries and/or thoughts and concerns of the DSSRC - your agency is and always will be a priority to the Company. Again, we appreciate all you do.

John T. Moran III, ESQ.

MORANGROUP

7301 Peak Drive, Suite 150

Las Vegas, Nevada 89128

Direct:

[REDACTED]

Mobile:

[REDACTED]

Main:

[REDACTED]

Facsimile:

[REDACTED]

Email:

[REDACTED]

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Attachment M



Laura Smith [REDACTED]

DSSRC Inquiry -- International Markets Live

Hoard Smith [REDACTED]

Wed, Sep 23, 2020 at 4:22 PM

To: Laura Smith [REDACTED]

Cc: Bonnie Patten [REDACTED]

Peter Marinello [REDACTED]

Joanne Li [REDACTED]

We hope you are all doing well and staying safe.

The decision with the Company Statement in the iMarkets inquiry is now available on our website: <https://bbbprograms.org/programs/all-programs/dssrc/dssrc-cases-and-closures> A copy is also attached for ease of reference.

Separately, I know we had discussed setting aside time for a catch up. Can you please send us some times that might work the week of October 19?

Best regards,

Howard

Howard Smith

Attorney

Direc. Selling Self-Regulatory Council
BBB National Programs



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2020.09.08 iMarkets Decision.pdf
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BBB NATIONAL PROGRAMS, INC.
The Direct Selling Self-Regulatory Council

Case Number: 25-2020 – NGO Inquiry – International Markets Live, Inc.

COMPANY DESCRIPTION

International Markets Live, Inc. (IML) is a New York based multi-level direct selling company that sells financial trading software and provides educational programs regarding financial trading to its customers.

BASIS OF INQUIRY

The Direct Selling Self-Regulatory Council (“DSSRC”) is a national advertising self-regulation program administered by BBB National Programs, Inc. Pursuant to section D(II) of DSSRC’s Policies & Procedures, DSSRC may commence an inquiry regarding the marketing disseminated by a direct selling company and/or its salesforce where the subject claims were referred to DSSRC by the Administrator of the Direct Selling Association’s Code of Ethics, through media reports, or identified by other parties. Here, a nonprofit, non-governmental organization (NGO) dedicated to protecting consumers¹ identified to DSSRC certain earnings claims for IML. Specifically, the NGO brought to DSSRC’s attention certain earnings claims being disseminated on the social media pages of certain Independent Business Owners (IBO’s) of IML. It alleged that many of the representations at issue include both express and implied claims that IML’s programs and educational opportunities will help individuals earn a minimum level of income and/or enjoy a lavish lifestyle. In the NGO’s initial written submission to DSSRC, it identified over 200 examples of such claims.

The representative earnings claims that were the subject of this inquiry are as follows:

Earnings Claims

- “full time income from home”
- “an extra \$10,000 a month residually!”
- “\$25,000-\$30,000/MONTHLY”
- “THE MONEY IS THERE wether [sic] I’m there or not”

¹ See Tina.org for additional information.



IDENTIFICATION OF ISSUES

According to the NGO, IML has been using and continues to use unsubstantiated earnings claims to market its products and services. The NGO stated that such claims – made both expressly and implicitly – include, but are not limited to, representations that IML’s products and educational programs can help participants earn a minimum level of income and/or live a luxurious lifestyle. The NGO further alleged that IML has previously claimed, and continues to claim, that participants in their program will make a five-figure monthly income, earn millions of dollars per year, travel the world, buy luxury vehicles and live a lavish lifestyle. The NGO asserted that these claims are unsubstantiated and are belied by the Company’s 2018 Income Disclosure Statement that indicated that 95 percent of the Company’s participants averaged less than \$300 annually and that such amount is before expenses including accounting for monthly costs required to earn commissions. Examples cited to by the NGO of allegedly exaggerated earnings claims included those made by IML’s top performing IBOs and the Company’s leadership.

The NGO stated that it previously contacted IML in 2018 and brought more than 50 examples of allegedly unsubstantiated earnings claims to the Company’s attention that had been disseminated by the Company’s CEO as well as top IBOs. In response, IML stated through its Chief Operating Officer that the Company’s IBOs would be educated on proper procedures and any communications in violation would be taken down. Specifically, the NGO pointed to a July 2018 letter from the Company that stated, among other things, that IML “absolutely agree[d] that unrealistic income claims, as well as any income claims on social media is not good,” that all IML IBOs would “be trained with ‘Do’s and Don’ts’ in regard to any social media posts,” and that Company executives and top

IBOs “ha[d] made errors in comments or posts from the past, ha[d] been notified to eliminate any communication that is considered any type of income claims.”²

According to the NGO, while the Company removed a majority of the examples of earnings claims that the NGO identified to the Company in 2018, the NGO has since collected more than 200 additional examples of unsubstantiated earnings claims, making it clear, the NGO argued, that IML did not properly or fully address the types of earnings claims at issue. In short, the NGO argued that IML was put on notice of problematic earnings claims being disseminated on its behalf in 2018, admitted that unsubstantiated earnings claims are unacceptable and vowed to correct the issue and train its IBOs. The NGO maintained that the Company nevertheless continues to mislead consumers with unsubstantiated earnings claims.

The NGO also maintained that IML’s written response to DSSRC in this inquiry made clear that the Company does not dispute the fact that a multitude of unsubstantiated earnings claims have been and continue to be disseminated by the Company and its IBOs. The NGO argued that IML’s implementation of a compliance system/department, has been ineffective. Specifically, the NGO submitted that IML has acknowledged past use of problematic income claims to promote IML’s business and has assured DSSRC of its efforts to curtail and prevent the use of new problematic claims. The NGO stated that IML’s attempts to ensure that its IBOs are not disseminating problematic earnings claims have ineffective and not working, and that IML needs to thoroughly examine its training and oversight systems to ensure that problematic earnings claims are not being disseminated.

Further, the NGO took issue with Company’s recitation of its company compliance policies. Specifically, the NGO noted, that according to IML, the Company informs its IBOs that they must, “conduct themselves in a professional, honest and considerate manner,” and may not make, “exaggerated income or service claims.”³ However, the NGO argued that such policy is incomplete. Specifically, the NGO asserted that in addition to the Company’s IBOs being required to be honest and prohibited from depicting results that are not representative of what consumers will generally achieve, a successful top IBO cannot make even honest claims of what their income is if that income is not representative of what a typical IBO earns.

COMPANY’S POSITION

IML explained to DSSRC that the Company is involved in direct sales and network marketing and additionally deals with on-line education focused on the financial markets. Specifically, the Company provides users with on-line educational opportunities, tools, and mentorship programs focused on educating the user about various financial markets. The Company describes itself in its Statement of Policies and Procedures as, “a direct to

² https://www.truthinadvertising.org/wp-content/uploads/2019/12/6_18_18-iMarketLive-statement.pdf

³ Int’l Markets Live, Inc., *Statement of Policies and Procedures*, IM ACADEMY sec. 1.2 (Jan. 15, 2019), <https://im.academy/policies>.

consumer, subscription based, training and education company that markets its Services through a network of independent business owners.”⁴

IML stated that to become an IBO an individual must adhere to the Company’s Statement of Policies & Procedures, Mutual Commitment Statement, and Code of Ethics. The Company noted that it expects all IBOs to conduct themselves in a professional, honest, and considerate manner.⁵

IML expressly provides in its Statement of Policies and Procedures that IBOs must not make any exaggerated income or service claims and additionally must not engage in unethical business practices.⁶ Additionally, the Company stated that it prohibits any IBO from making any income projections, claims, or guarantees to prospective IBOs or customers.⁷ The Company defines income claims as including, but not limited to, copies of checks, bank statements, rank earnings, tax documents, trading profits, lifestyle claims, and photos depicting lavish lifestyles.⁸ Income claims are expressly prohibited at events and from being posted on social media.⁹ If an IBO is found to have violated this policy, the Company maintained that such IBO is reprimanded, and the IBO will be instructed to remove the offending claim or social media post immediately.¹⁰

The Company maintained that it shares DSSRC’s mission in enhancing consumer confidence in direct selling advertising and marketing by providing assurance that direct selling earnings and product claims that are communicated in direct selling advertising and marketing are truthful, accurate, disclose information material to consumers and have the necessary evidentiary support. The Company also informed DSSRC that its priority is, “geared toward and focused upon the application of consumer protection principles to its business practices, especially in the legal realm or legal department”

IML’s Compliance Process

IML outlined its compliance process to DSSRC; specifically, the Company informed DSSRC that its IBOs are, “encouraged to educate and train new IBOs about IML’s Services, effective sales techniques, the IML Compensation Plan, along with compliance with IML Policies and Procedures and any and all social media guidelines or any other guidelines”¹¹ The Company also stated that it has implemented an in-depth compliance program including, but not limited to, proactive avoidance and company-wide education in order to prevent messages that may be viewed as false or misleading.

⁴ Id., § 1.5.

⁵ Id., § 1.1.

⁶ Id.

⁷ Id.

⁸ Id., §11.2

⁹ Id.

¹⁰ Id., §11.2

¹¹ Id., § 3.3

IML informed DSSRC that all IBOs must submit any sales, marketing, promotional, and training materials to the Company's Compliance Team prior to dissemination for written approval.¹² According to the Company's Statement of Policies and Procedures, unless the IBO receives specific written approval, the request to disseminate any materials are deemed to be denied.¹³

With respect to the Company's compliance and monitoring structure, IML argued that it has implemented a careful monitoring and early detection system in order to be proactive in avoiding the issue of problematic claims being disseminated by IBOs. If the Company determines that an IBO has violated the Statement of Policies and Procedures, the Company may issue disciplinary actions at its discretion. The Company outlined to DSSRC the various actions that may be taken pursuant to a violation of the Policies and Procedures including but not limited to: monitoring an IBO's conduct to ensure compliance; issuing a written warning; suspension from the Company or suspension from events, rewards, or recognition; and termination.¹⁴

IML informed DSSRC that a first-time violation by an IBO will result in counseling and an initial warning letter from the Company.¹⁵ The Company maintained that such letter provides the Company's Compliance Team an opportunity to bring the issue to the attention of the IBO and inform such IBO of the Company's Policies and Procedures.¹⁶ The Company further stated that a second violation by an IBO will result in a warning letter and a temporary suspension.¹⁷ A third violation, IML maintained, will result in a termination of the IBO.¹⁸

IML maintained that it has taken multiple steps in correcting previous violations with respect to claims by its IBOs as well as in preventing future violations. The Company informed DSSRC that it revamped its Statement of Policies and Procedures as to ensure the Company's commitment to truth and accuracy in its marketing practices and material disseminated via social media and the internet. During the pendency of this inquiry, the Company stated that it disseminated a company-wide notice informing IBOs about the importance of strict compliance with the Company's Statement of Policies and Procedures in an effort to further educate the IBOs about the contents of the Company's Statement of Policies and Procedures. The Company pledged itself to "do better" and to protect consumers and further enhance confidence that consumers have in the direct selling marketplace.

The Claims at Issue

IML took the position in this inquiry that many of the earnings claims at issue have been taken down and that the Company was in the process of removing any remaining claims during the pendency of this inquiry. Additionally, as noted above, the Company

¹² Id.
¹³ Id., § 3.3
¹⁴ Id., § 7.3
¹⁵ Id., § 7.4
¹⁶ Id., § 7.4
¹⁷ Id.
¹⁸ Id.

asserted that it educates its IBOs about the Company's Statement of Policies and Procedures and has implemented a compliance program that allows for prompt enforcement.

In addition, IML has provided DSSRC with a spreadsheet containing information regarding the status of the claims at issue in this inquiry.¹⁹ The spreadsheet catalogued the social media posts at issue and the status of each respective post. The spreadsheet shows that the vast majority of the subject marketing claims for IML have been entirely removed and the subject IBOs were either notified of the violation and further educated on how to avoid future issues, suspended, or terminated from the Company. IML stated that while it is appreciative any time a third-party informs it of needed improvements to its compliance processes and efforts, it nonetheless respectfully disagreed with the NGO's characterization that IML "turned a blind eye to deceptive income claims being used to promote its business opportunity."

ANALYSIS AND RECOMMENDATION

Given that the Company agreed that the earnings claims identified to DSSRC by the NGO violated the Company's Policies and Procedures, there is no dispute that such claims should not have been disseminated by the Company's IBOs. DSSRC acknowledged the Company's efforts to promptly have such claims removed from circulation and determined that such removal was necessary and appropriate. The spreadsheet the Company provided to DSSRC cataloging the claims at issue in this inquiry shows that the vast majority of the claims at issue were removed. DSSRC independently confirmed that the claims were in fact removed. In a few instances, where a particular IBO was unresponsive to IML's efforts to contact them, the Company terminated the IBO in question which DSSRC also found to be necessary and appropriate.²⁰

With respect to IML's efforts to enhance its compliance process as well as its training and monitoring of the Company's IBOs, DSSRC acknowledged the Company's efforts and determined that such actions are necessary and appropriate. DSSRC also recommends that IML engage in effective training and monitoring of its IBOs and use appropriate enforcement procedures to provide reasonable assurance that earnings

¹⁹ https://docs.google.com/spreadsheets/d/1XCh54_1d1FCMfDN6vQ4YaDgKJ-y2n2oxlr8B-bFHEgM/edit#gid=0

²⁰ In a small number of instances, the spreadsheet provided by the Company noted that a particular IBO did not reply and is no longer with the Company. As prior self-regulatory precedent makes clear, DSSRC acknowledges that a direct selling company may not be able to require a former or inactive salesforce member to remove a claim. In that instance, DSSRC nonetheless recommends that the direct selling company make a bona fide good faith effort to have the improper claim removed including a written request to remove improper claims made by salesforce members that have since become inactive. In addition, if the social media platform where the subject post was made provides a mechanism for reporting trademark or copyright violations, DSSRC recommends that the direct selling company promptly utilize such mechanism and seek removal of the subject claims and posts. If the subject claim occurred on a website or platform without a reporting mechanism, DSSRC recommends that in addition to contacting the former IBO in writing as described above, the Company contact the website or platform in writing and request removal of the subject claim or post. Young Living Essential Oils, LLC, Case No. 13-2020.

claims made by its IBOs are substantiated, contain appropriate disclosures and are not misleading.

As to the NGO's assertion that it is not enough for the Company to inform its IBOs that they must, "conduct themselves in a professional, honest and considerate manner," and may not make, "exaggerated income or service claims," DSSRC agrees that even truthful claims may be misunderstood by reasonable consumers. According to section 255.2 (b) of FTC's Guides Concerning the Use of Endorsements and Testimonials in Advertising, an advertisement containing an endorsement relating the experience of one or more consumers on a central or key attribute of the product or service also will likely be interpreted as representing that the endorser's experience is representative of what consumers will generally achieve with the advertised product or service in actual, albeit variable, conditions of use. Therefore, an advertiser should possess and rely upon adequate substantiation for this representation. If the advertiser does not have substantiation that the endorser's experience is representative of what consumers will generally achieve, the advertisement should clearly and conspicuously disclose the generally expected performance in the depicted circumstances. Accordingly, as to any truthful but atypical earnings claim that is disseminated by an IML IBO, DSSRC recommends that any such advertising materials (e.g., social media posts) be accompanied by a clear and conspicuous disclosure indicating the percentage of IBOs that achieve the depicted success. DSSRC notes, however, that "Depending on the level of success, some income claims and lifestyle claims may be so extraordinary that they cannot be effectively qualified by a disclosure of generally expected results." DSSRC Guidance on Earnings Claims for the Direct Selling Industry ("Earnings Guidance"), § 4

Conclusion

DSSRC acknowledged the Company's efforts to promptly have the earnings claims at issue in this inquiry removed from circulation and determined that such removal was necessary and appropriate. DSSRC independently confirmed that the vast majority of such claims were removed from circulation and that where a particular IBO was unresponsive to IML's efforts to contact them, the Company terminated the IBO in question which DSSRC also found to be necessary and appropriate.

With respect to IML's efforts to enhance its compliance process as well as its training and monitoring of the Company's IBOs, DSSRC acknowledged the Company's efforts to enhance its compliance, training, and monitoring and determined that such actions are necessary and appropriate. DSSRC recommends that IML engage in effective training and monitoring of its IBOs and use appropriate enforcement procedures to provide reasonable assurance that earnings claims made by its IBOs are substantiated, contain appropriate disclosures and are not misleading. If an IBO that has disseminated problematic claims is no longer active or will not respond to the Company, DSSRC recommends that the Company nonetheless make a bona fide good faith effort to have the problematic claims removed from circulation.

Finally, as to the Company's policy that its IBOs may not make, "exaggerated income or service claims," DSSRC notes that even truthful claims may be misunderstood by reasonable consumers and, therefore, an advertiser should possess and rely upon

adequate substantiation for any truthful depiction of success. If the advertiser does not have substantiation that the individual whose experience is depicted is representative of what consumers will generally achieve, the advertisement should clearly and conspicuously disclose the generally expected performance in the depicted circumstances. In addition, as to any truthful but atypical earnings claim that is disseminated by an IML IBO, DSSRC recommends that any such advertising materials (e.g., social media posts) be accompanied by a clear and conspicuous disclosure indicating the percentage of IBOs that achieve the depicted success provided, however, that some claims may be so extraordinary that they cannot be effectively qualified by a disclosure of generally expected results.

Company Statement

IML respects the self-regulatory process and appreciates the time and attention the DSSRC has devoted to this matter. First, IML appreciates the DSSRC's acknowledgment of the Company's efforts to promptly remove such earnings claims at issue from circulation. It was duly noted by the DSSRC that the spreadsheet provided by the Company, cataloguing the claims at issue, served as supporting and corroborating evidence of the Company's steadfast removal of the vast majority of such claims at issue. Second, the DSSRC recognized and also, acknowledged the Company's efforts to enhance its compliance process as well as its training and monitoring of the Company's IBOs. IML will continue the utilization of strict enforcement procedures to avoid and deter earnings claims made by IBOs that are unsubstantiated inappropriate or misleading. And third, IML agrees with the DSSRC that even truthful claims may be misunderstood and that an advertiser should possess and rely upon adequate substantiation for any truthful depiction of success. IML will be guided by the DSSRC recommendations in its ongoing marketing programs.

(Case No. 25-2020 HJS, closed on 09/9/2020)
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Attachment N



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London, United Kingdom

workwithaustingodsey London, United Kingdom is on fireee..... 🇬🇧🔥👊👊
Hopped off the flight and drove an hour away straight to the GVIML office in Canary Warf(Wallstreet of England)..... 38 people in the room for the Platinum 150 & above leadership training..... 🇬🇧🔥👊👊 @suhail Shabaz @yasin.subhan are all in their teens or 20's and about to CRACK a 6 figure income within the next 90 days..... 💰💰👊
Tomorrow we have 4 events ALL within 4 hours..... Amateurs join professionals launch..... Having so much fun out here about to take things to a whole different level..... 🇬🇧🔥👊👊 Be RELENTLESS asf..... Literally when I lost 9,000+ teammates in 3 weeks last year during company struggles I didn't give up like most did..... Resigned at Chairman 100 making \$160,000 per month and went back down to a few thousand in



187 likes

FEBRUARY 15

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London, United Kingdom

Chairman 100 making \$160,000 per month and went back down to a few thousand in savings and blew thru everything trying to launch a different company for 7 months and the company didn't pay out \$1 to my team or I..... I kept the SAME savage shark mode mentality..... Just like this picture here been going all in for 4 years straight no days off no letting up..... If we can do it so can you..... Stay Savage my friends..... 🔥👊
#TradeTravelTransform Go follow my main account 🇬🇧 @imaustingodsey 🇬🇧 #Forex #ForexTrader #WealthMindset #MillionaireMindset #Ceo #ForexSignals #ForexQuotes #ForexTraining #MillionaireMentor #PennyStocks #Investing #Millionaire #Billionaire #Stocks #ForexExchange #LaptopLifestyle #Bossbabe #Entrepreneur #Invest #MakeMoneyOnline #MakeMoneyFromHome #ForexTrading

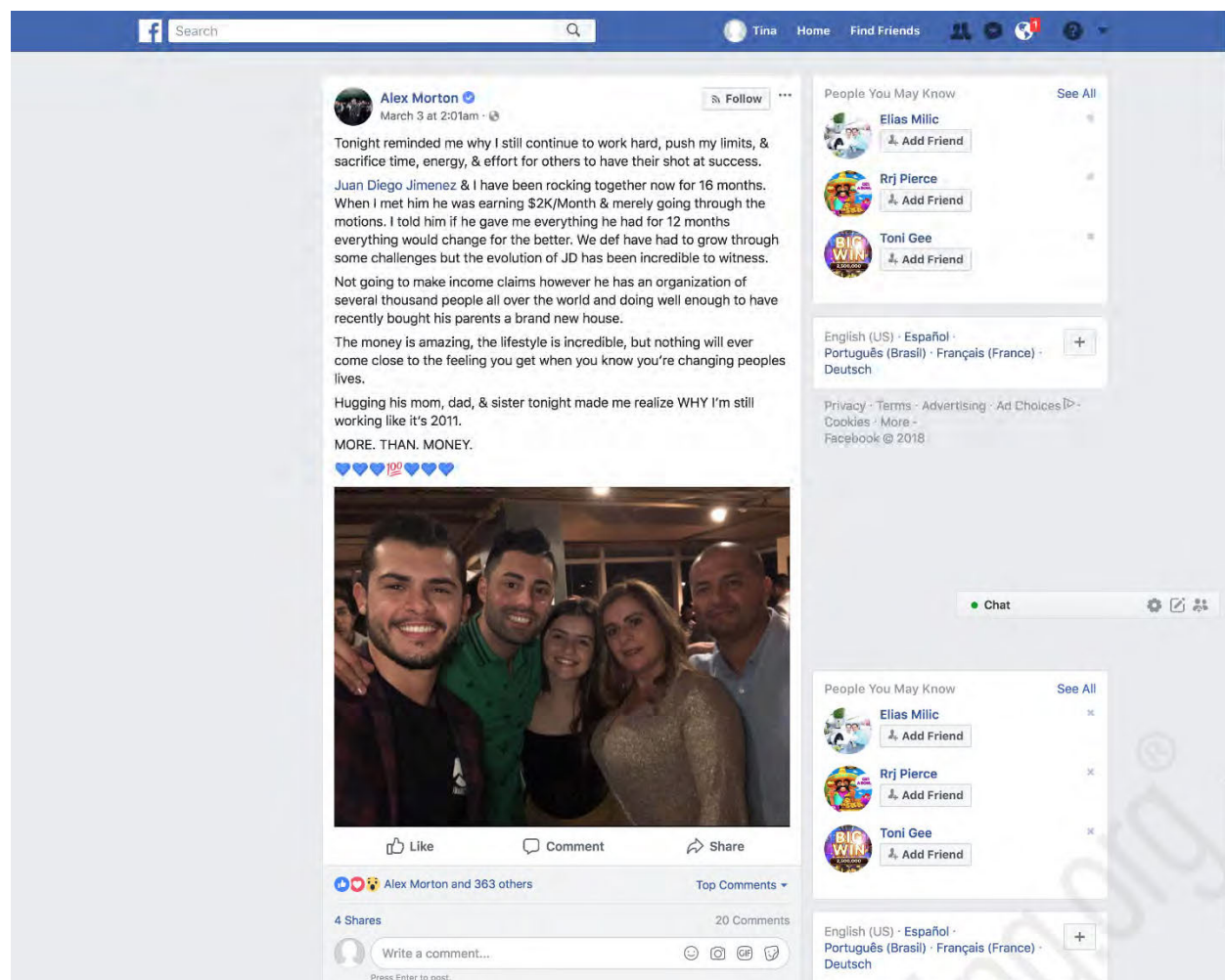


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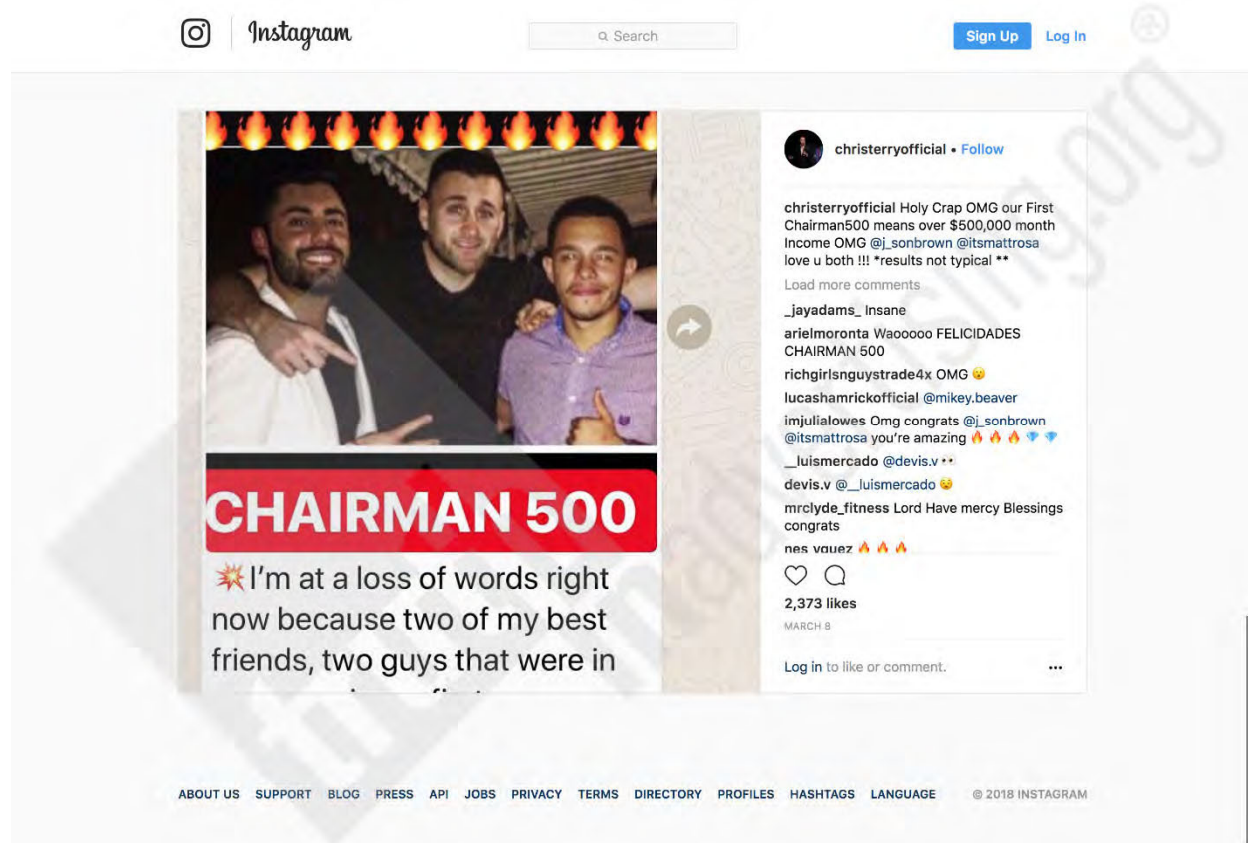
FEBRUARY 15

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6Figuresin90Days

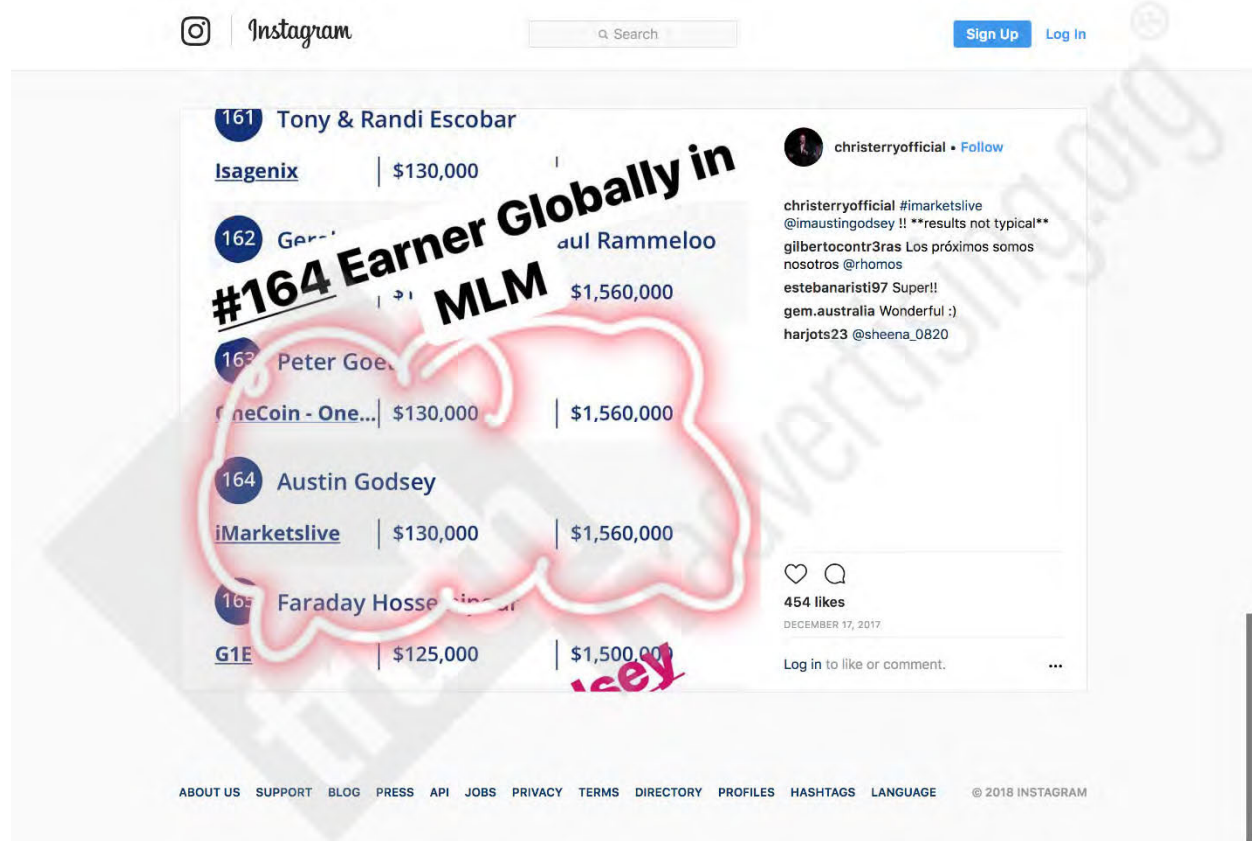


Alex MortonHousefortheParents

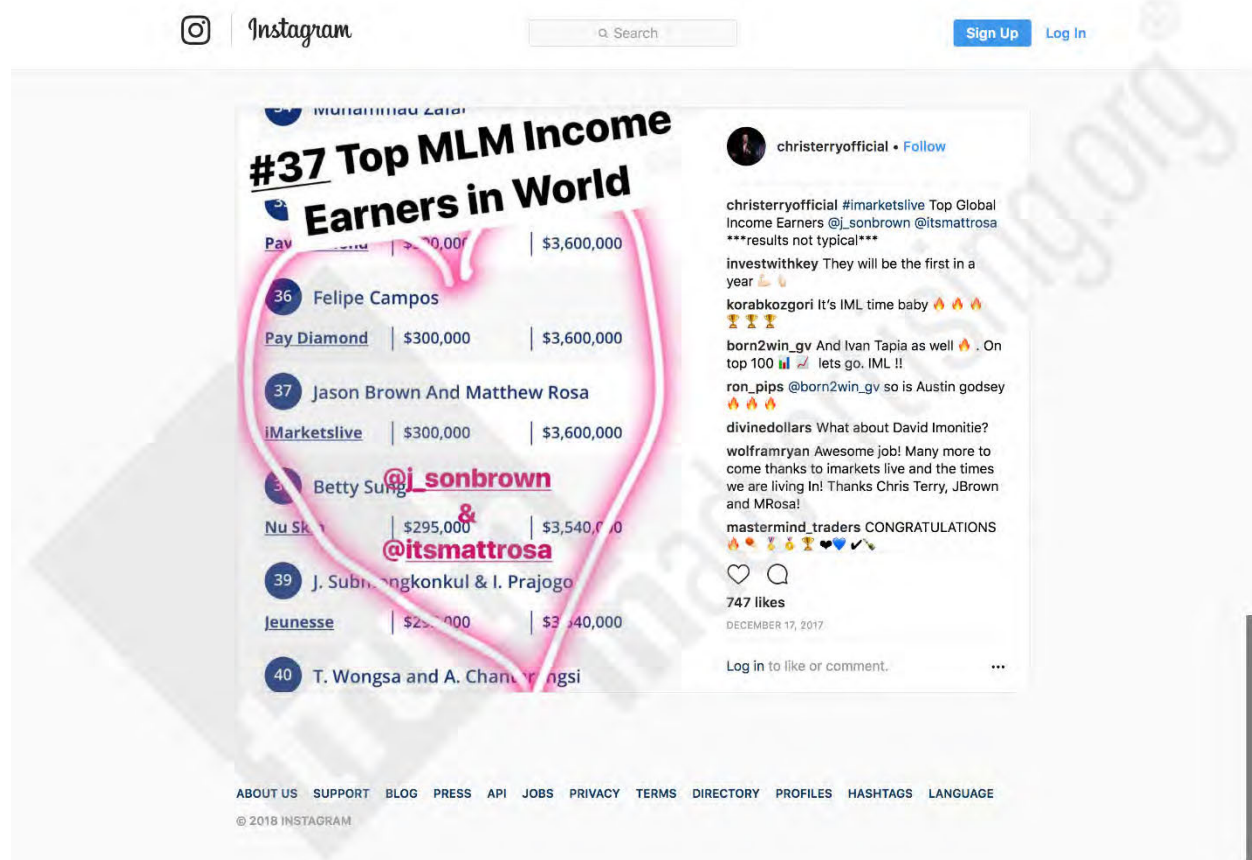


ChrisTerryInstagram1

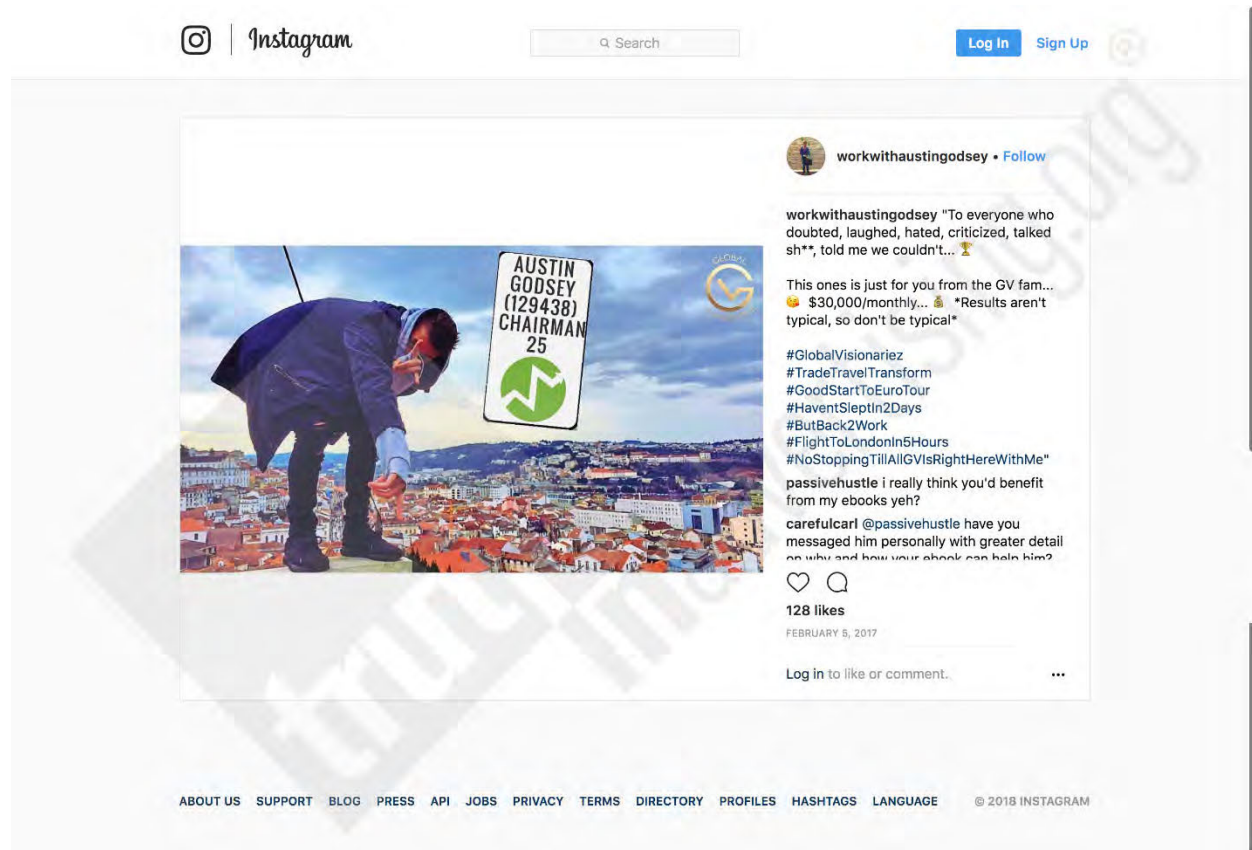




ChrisTerryInstagram3



ChrisTerryInstagram5



ForTheHaters

000992

23 year old college dropout homeless 1 year ago 🎓 🚶



**Now making 2.5 million
Pesos a year in Mexico 💰 📈**



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workwithaustingodsey When I first met Fernando Madero Rios less than a year ago, he messaged me through Facebook asking if we partnered could I mentor him and work with him directly... 📧

he barely spoke any English, was living out of a suitcase and backpack, was living off some savings he had, jumping around from city to city all trough mexico, hadn't seen his mother in months because he wanted to come back when he was in a better financial position, had never seen much success before.... 🇲🇽 Now he's making 2,448,000 (\$12,000/monthly) pesos per year, MULTI MILLIONAIRE in Mexico where down here the average wage is \$200 a month, speaks banging English, is helping thousands of people on his team winning, less than 100 people away from smashing Chairman



126 likes

AUGUST 29, 2017

Log in to like or comment.

...

23 year old college dropout homeless 1 year ago 🎓 🚶



**Now making 2.5 million
Pesos a year in Mexico 💰 📈**



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people away from smashing Chairman 25(\$25,000/monthly), been able to give back to his mother SO MUCH, is now touring and traveling the world speaking in front of hundreds and thousands of people in homes and stages making an impact and creating a legacy... So much respect for you Fer... 🙏 I didn't post this right away because I didn't feel the need to because this was something so important and special outside of social media it was a blessing to soak in.... But like Fernando says it's "My time to shine" so I wanted to shoutout my bestyyy for being the LEGEND that he is and becoming a CHAIRMAN!!!! 🏆

We've been all through Mexico together tour after tour it's insane, from sleeping in friends cars, dirty buses, teammates floors, busy airports, doing home events in the



126 likes

AUGUST 29, 2017

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...

Mexican MultiMillionaire

23 year old college dropout homeless 1 year ago 🎓 🚶



**Now making 2.5 million
Pesos a year in Mexico 💰 📈**



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busy airports, doing home events in the hood in alleys and on top of people's cars with a laptop, getting held up on tour in the mountains of michuacon, sleeping 3-4 people in hotel beds at a time on tour, to speaking on stage in front of thousands, traveling all over the world together, hit 7 and 6 figure incomes living together on the beach in Mexico together sheesh bro it's insane the story.... I saw you stay stagnant at Platinum 5000 for 5 months and get over that freaking hump and SMASHING Chairman!!!! You watched me Plateau at 25 for 5 months too, then we both made the decision to flip the switch and then both ranked up to 10 and 50.... But it wasn't just us who has been rank

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👉 @ImAustinGodsey 👈

workwithaustingodsey #ForexTrading



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AUGUST 29, 2017

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23 year old college dropout homeless 1 year ago 🎓 🚶



**Now making 2.5 million
Pesos a year in Mexico 💰 📈**



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that freaking hump and SMASHING Chairman!!!! You watched me Plateau at 25 for 5 months too, then we both made the decision to flip the switch and then both ranked up to 10 and 50.... But it wasn't just us who has been rank

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#Quotes #QuoteOfTheDay #Bookstagram
#Books #Bookworm #BookLover #Traveller
#Travels #TravelPhotography #Pips
#BossLife #Knowledge #Nuggets #Mentor
#Mentorship #InstagramMarketing
#MillionaireMindset #7figures #CEO



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AUGUST 29, 2017

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...

Mexican MultiMillionaire

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workwithaustingodsey Just had my 2nd highest earning check in my career today... 🙏🙏🙏 LOVE YOU MAMMA thank you lord for all your blessings... 🙏🙏🙏 Don't wanna post this to brag, I wanna post this to show what believing in something before it manifests into reality can actually do... I wanna show you what growing up with a single mom can equate to... What going to 13 schools in 12 years can accomplish... What having a 1.9 GPA can create... What a GED can build... What being homeless can lead to... How being so broke on food stamps and cash assistance can lead to a plate full... Where being evicted from house after house can move to... Where sleeping out of hotels with my son could go... 🙏

Money doesn't make the man, man makes the money... Wealth only makes you more of

141 likes

SEPTEMBER 4, 2017

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Money doesn't make the man, man makes the money... Wealth only makes you more of who you are as a person... 🙏

Senior year in High School my teach told me that if I were to drop out I would never make it... She pulled out a chart that stated the following... 🙏 •4 year College Degree - \$46,930 🙏 •2 year College Degree - \$36,190 🙏 •High School Diploma - \$27,380 🙏 •High School Dropout - \$19,540 🙏


I realized most people don't have my best interest in mind, and even if they did they didn't know what was good for me.... What's crazy is if you ask 10 of your friends if they can help you at 8am this coming Saturday to move out of your house you can't afford a mover, half most likely won't even text back and act like they didn't see the text, at least

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SecondHighestCheck



GLOBAL VISIONARIEZ

Payment from iMar... \$9,487.05
Aug 18, 2017

Payment from iMar... \$12,614.00
Aug 18, 2017

Average income by education, 2009

| | |
|----------------------------|----------|
| Four-year college degree | \$46,900 |
| Some college/assoc. degree | \$36,190 |
| High school diploma | \$27,360 |
| High school dropout | \$19,540 |

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and act like they didn't see the text, at least 25% of them will make excuses oh I'm busy I can't I gotta do this, and maybe 2 or 3 if you're lucky will be a real homie and come help you out... 🙏🙏 The road to the top can sometimes be a lonely one... People want to see you good just not better than them... Be VERY careful of people who will try to tell YOU what you CAN and CANT do based upon their belief levels in THEMSELVES... One day the people who never believed in you will talk about how they know you... 🙏 I implore you, don't waste your time trying to help people change into what you need them to be... You are NOT a parole officer, you are NOT a drill sergeant, you are not the CEO of Fix People, Inc. Let people be themselves

workwithaustingodsey #PrettyGirls #Traveling #TimeFreedom #FinancialFreedom #Hustle #Hardwork

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GLOBAL VISIONARIEZ

Payment from iMar... \$9,487.05
Aug 18, 2017

Payment from iMar... \$12,614.00
Aug 18, 2017

Average income by education, 2009

| | |
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| Four-year college degree | \$46,900 |
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based upon their belief levels in THEMSELVES... One day the people who never believed in you will talk about how they know you... 🙏 I implore you, don't waste your time trying to help people change into what you need them to be... You are NOT a parole officer, you are NOT a drill sergeant, you are not the CEO of Fix People, Inc. Let people be themselves

workwithaustingodsey #PrettyGirls #Traveling #TimeFreedom #FinancialFreedom #Hustle #Hardwork #Entrepreneur #Snapchat #Instafame #Billionaire #Jetlife #Sheesh #BookADay #Lifestyle #LadyBoss #Goals #Determination #Vision #Visionary #BookClub #Library #PersonalDevelopment #Grind #BossBabe #Entrepreneurship #HustleHard #ForexTrader #ForexSignals

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Published on Mar 10, 2014
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If you dream about living the life of a successful trader with the reputation and highly lucrative earning potential that comes with it, but lack the skills you need or the time to learn them, YOU ARE NOT ALONE!

Whether it is because you work long hours at a job, have multiple businesses to manage, or simply not interested in learning how to trade, this does not have to be the only barrier standing between you and a financially rewarding trading business, any longer.

What if you could start earning unlimited income from trading FOREX & Futures with little or no knowledge about the markets?

You DO NOT even need to know what a Buy/Sell means!!

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INTRODUCING OUR "TRADE SIGNAL SERVICE"
Are you a beginner yet to learn the ropes of successful trading? Or an intermediate /advanced trader whose trades have hit the wall? Our exclusive Trade Signal Service makes it possible to build your very own trading business that will put you on the path towards financial freedom. Does the thought of potentially earning a lucrative income month after month excite you? Well, you can stop daydreaming right now and take action to make this a reality!!

IML's Trade Signal Service gives you access to the SAME BUY & SELL signals sent by our traders in the Live Trading Room. We do all the hard work for you by watching the markets for hours, until a golden opportunity is spotted then with our expertise the right signals are immediately sent to you. This gives you the freedom to go about your daily activities without worrying about finding the knowledge and/or time to analyze and time the markets.

If earning HIGH INCOME is your top priority, there has never been a better opportunity. Christopher Terry and his team of market professionals have decades of extensive expertise and experience in the markets. When we trigger FOREX or Futures signals for our Live Trading Room, within a fraction of a second you can automatically receive a copy of our Trade Signal to your very own trading account! Essentially, you ARE trading, just like each of our members in the Live Trading Room and successful traders around the globe!

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SecretWeapon

Attachment O

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| TITLE | IM MASTERY |
| DATE | RECORDED: DATE UNKNOWN TRANSCRIBED: AUGUST 29, 2023 |
| PAGES | 1 THROUGH 5 |

CHRISTERRYINSTAGRAM6

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IM Mastery

9/5/2023

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4 RECORDING:

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4 IM Mastery) Matter No. 2123090

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IM Mastery

9/5/2023

1 P R O C E E D I N G S

2 - - - - -

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4 CHRISTOPHER TERRY: This is Christopher
5 Terry, CEO of iMarketsLive, and looking over my views
6 here from Central Park and just wondering how many of
7 us in iMarketsLive have the ability to live like this.
8 All of us. Every single one of our people in
9 iMarketsLive has the same ability to have this
10 lifestyle where you could wake up in the morning over
11 Central Park with \$10 million views.

12 You know what it is? It takes time and
13 effort. Time and effort. Each and every one, you
14 could live this lifestyle if you choose to. You could
15 look out one day over Central Park and you could live
16 in any building you want. You could live right here.
17 You could live there. You can do whatever you like.
18 You could live in this -- where I am, all right?

19 Have peace of mind -- ultimate peace of mind
20 and not let anybody stand in your way, not let anybody
21 steal your dream. Okay?

22 I believe in you, just let's do it.

23 (The video recording was concluded.)

24

25

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ChrisTerryInstagram6

IM Mastery

9/5/2023

1 CERTIFICATE OF TRANSCRIPTIONIST

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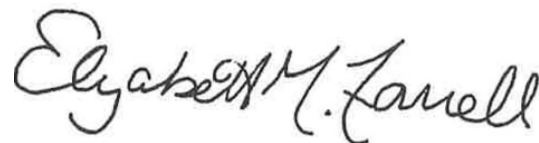
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| | |
|------------|--|
| MATTER NO. | 2123090 |
| TITLE | IM MASTERY |
| DATE | RECORDED: DATE UNKNOWN TRANSCRIBED: AUGUST 29, 2023 |
| PAGES | 1 THROUGH 7 |

COMP PLAN VIDEO

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CompPlanVideo

IM Mastery

9/5/2023

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1 P R O C E E D I N G S

2 - - - - -

3 CompPlanVideo

4 (Music playing.)

5 ANNOUNCER: Do you know what's better than
6 money? A, More money; B, money that just keeps coming
7 at you, or C, all of the above.

8 Interested? Of course you are. Listen
9 closely.

10 For a total of \$195 paid today and for \$95 a
11 month, you could become a retail customer, and for
12 only \$5 per month extra, you can become an IBO, an
13 independent business owner. Being an independent
14 business owner allows you to sell our retail services
15 and develop your own network of independent business
16 owners, or as we like to say, IBOs. This gives you
17 the opportunity to earn up-front and ongoing residual
18 income from our compensation plan.

19 Let's say you are an IBO and you enroll John
20 as your personal customer. You earn \$100 from the
21 \$195 he pays to get started. You earn a 50 percent
22 first order bonus.

23 Well, you also earn 4 percent of the
24 remaining \$95. This \$95 goes into our matrix
25 commissioning system that will reward you 4 percent

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1 per level for the next eight levels of retail sales
2 volume that you are directly or indirectly responsible
3 for.

4 In our 3 by 8 matrix system, there are 9,840
5 spots to fill up. Imagine earning 4 percent for all
6 the sales of up to 9,840 people on your team. And
7 this is only one of our bonuses.

8 We recognize success, and for those IBOs who
9 want to help as many people as personally possible, we
10 added an exciting 100 percent check match bonus. This
11 means when you help your personally sponsored IBOs
12 earn an income off their matrix, the company will
13 reward you with a monthly bonus equal to their check.

14 Let's say you help John earn \$1,000 a month
15 off his 3 by 8 matrix. Well, your monthly check match
16 is \$1,000 also. You can have as many check matches as
17 you want. What if you had 20 checks or 30 checks of
18 \$1,000, \$2,000, or even, \$10,000 per month?

19 We then have an additional three bonuses
20 that pay you off your entire group volume from first
21 level to infinity. Yes, infinity. Let's just say you
22 have a runaway leg that goes 10 or 20 or even 100
23 levels deep. When you qualify, you can earn 1 percent
24 or 2 percent or even 3 percent additional from your
25 first level. Now, imagine earning a total of 7

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1 percent on your first eight levels of your matrix.

2 There's no limit to your earning potential with IML.

3 Since our products are global, we service
4 customers and affiliates worldwide. This means you
5 could earn a true global residual income. The power
6 of networking is that you can enroll somebody in your
7 home country and it can spread around the world to
8 nearly 120 countries. Powerful.

9 So think about it. You're not just getting
10 a product here. You're getting access to a business,
11 a real business with no limitations. One of the most
12 powerful concepts in the world is leverage and
13 iMarketsLive provides you the ability to leverage your
14 time, efforts, and money. What are you waiting for?

15 Just contact the person who shared this
16 video with you and get started today.

17 (The video recording was concluded.)

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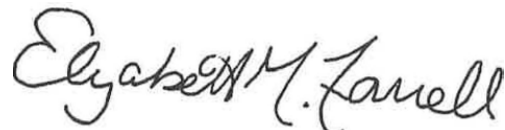
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6 MATTER NO. 2123090
7 TITLE IM MASTERY
8 DATE RECORDED: DATE UNKNOWN
9 TRANSCRIBED: AUGUST 29, 2023
10 PAGES 1 THROUGH 11

11 FINANCIAL FREEDOM BRANDON BOYD

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FinancialFreedomBrandonBoyd

IM Mastery

10/11/2023

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5 FinancialFreedom Brandon Boyd

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1 P R O C E E D I N G S

2 - - - - -

3 FinancialFreedom Brandon Boyd

4 (Music playing.)

5 BRANDON BOYD: -- iMarketsLive. My name is
6 Brandon Boyd. I'm a leader at iML and Global
7 Visionaries, former master distributor, married,
8 father of five.

9 Guys, I want to cover the compensation plan,
10 the simple, powerful way to get paid as a part of this
11 company. The first part that I think is so powerful,
12 it creates that foundation for great wealth is the
13 perfect storm bonus. And so the goal -- this is all
14 about momentum, guys. The goal is to get three
15 personals, three subscribers. I don't care if they're
16 IBOs, if they're customers. The key is to get three
17 subscribers within the first seven days. Why? That's
18 going to create momentum. Just like a snowball, it
19 starts to grow. It gets those people -- it's the
20 speed of the leader is the speed of the group. It's a
21 one-time bonus.

22 So for example, if I do that in seven days,
23 I'm going to make a \$150 commission on each of those
24 subscriptions, which is what? \$450. However, the
25 company is going to reward me for that, give me an

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1 extra \$150 bonus, so \$600 total in the first seven
2 days. So this is a fast start bonus called The
3 Perfect Storm. Okay? Get that done in the first
4 seven days. That's going to create a great
5 foundation.

6 Then there's a Team Builder Bonus. This is
7 a uni-level commission. It's paid weekly, not
8 monthly. This is where you can earn anywhere between
9 \$20 to \$50 per new subscriber, okay? So you're a
10 platinum director. It goes down 12 levels deep. So
11 every time that someone enrolls, you're getting that
12 opportunity with that rank in the Team Builder's Bonus
13 to get between \$20 to \$50. Guys, this is huge and it
14 starts to compound just like the compounding of a
15 penny every single day.

16 We also have the Rank Achievement Bonus.
17 This is a uni-level commission that's paid monthly.
18 You can earn anywhere between \$150 to \$4,000 a month.
19 This goes from platinum field director all the way up
20 to platinum chairman's club. So again, depending on
21 what rank you are, you're going to get this particular
22 bonus. So if I'm a platinum executive, that means I'm
23 going to make \$450 a month, as long as I maintain that
24 particular rank. And I'm going to break down how to
25 get to those ranks, okay?

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1 Then there's also the Chairman's Club Bonus.
2 This is for the people who, whether in the past or
3 they haven't done it before, they want to build a
4 significant business. They don't just want to be a
5 customer; they want to be an independent business
6 owner, someone who is a professional, not an amateur.
7 See, amateurs start a business. They enroll in a
8 business. Professionals, they launch a business.
9 That's where you can get into the Chairman's Club. So
10 this is where you're going to earn anywhere between
11 \$8,000 a month to \$100,000 a month.

12 And on top of that, let's say, for example,
13 you've got that 500 team. What does that mean? That
14 means I have 500 total subscribers on my team,
15 whether they're customers or IBOs. The company at
16 that rank is going to take money and put it into a
17 trading pool where Christopher Terry, the CEO of the
18 company, is going to trade the money for you. So
19 while you're at your job, you're with your family and
20 doing whatever it is that you need to do, he's going
21 to be doing those trades. You get 70 percent of the
22 profits from those trades. This is on top of the
23 commission.

24 Guys, that's almost like being given free
25 money just for building a sizeable organization.

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1 Okay? That is phenomenal. I mean, that is one of the
2 greatest gifts that you can get as far as finances are
3 concerned, is let the pro do the trades for you.

4 Now, we have the Team Residual Bonus. This
5 is a 3-by-8 matrix commission. It's paid monthly. It
6 pays eight levels deep at 4 percent of the total
7 monthly retail sales volume from your entire group,
8 okay? Four percent or \$3.80. Okay? That's the
9 commissionable volume off 95 CV.

10 So let's just do the math. Within eight
11 levels, if you were to do a 3-by-8 matrix, that's
12 about 9,840 total spots that are available to you.
13 Okay? At \$3.80 you're like, ah, that's not that much
14 money. Well, if you were to do the math, it's quite
15 phenomenal. Even if you're 80 percent off, you'd
16 still make a great income. Okay? So the Team
17 Residual Bonus is powerful.

18 Then we have the 100 percent Check Match
19 Bonus. This is on the personals paid monthly. Let me
20 give you a simple example. Let's say that Joe
21 sponsors Mary. Mary says, you know what, I don't want
22 to be curious, I'm going to get serious. I'm going to
23 build an income with this from her matrix. Let's say
24 she's making \$1,000 on a monthly basis. What are you
25 going to earn? You get 100 percent check match of her

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1 bonus, that's \$1,000 a month, equal to Mary's matrix
2 income.

3 Let's say that you've got a guy named Bob.
4 Bob goes out and does the same thing. He does 2,000;
5 you get 2,000, 100 percent Check Match Bonus. Guys,
6 this is not a one-time bonus. This is every single
7 month on your personals. So the key is to help your
8 personals that you got subscribed to the service to
9 become successful. All right?

10 Then we have the Infinity Bonus. This
11 is a bonus paid on your team sales. Volume, okay?
12 Not enrollments. I tell people all the time, you
13 don't get paid to recruit. That's illegal, okay?
14 You get paid to get people to subscribe to our
15 service, just like they would with anything else out
16 there. Okay? You're paid monthly, generation one,
17 two, three.

18 All this means is icing on the cake. As my
19 organization grows, as my volume increases, I have the
20 opportunity to get more and more bonuses beyond 12
21 levels, generation one, two, and three. That opens up
22 so many more generations of subscribers in your
23 organization to make more money.

24 Now, this is a simple breakdown, guys, to
25 make this -- really to show the foundation of what you

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1 need to do. Remember, I want to get into the Club
2 150, what do I have to do? I need three personal
3 subscribers. It doesn't matter if it takes seven
4 days, seven weeks, seven months. I need three. Okay?
5 When you do that, B3H3G3, you say bring three, help
6 three, get three, you're at the Club 600, you've got
7 12 subscribers, \$600 bonus a month. See 92 percent of
8 people wouldn't file bankruptcy if they had an extra
9 \$3- to \$500 a month.

10 The reason why I focus on Club 150 and Club
11 600 is because what the mind can conceive and believe
12 it can achieve, it's so powerful to have something
13 that you create that foundation and all you do is you
14 help those people do the same thing if they have the
15 desire and, of course, all the way down to Chairman
16 100, 100,000 a month, it's paid weekly, 25,000 a week.
17 I'm sure that you guys can survive off that kind of
18 income.

19 Guys, this is the simple breakdown of the
20 iMarketsLive compensation plan. I think some people
21 can make it pretty complicated, but it's quite simple.
22 All I'd need to do is get three subscribers and teach
23 them to do the same. As I do that, as I develop
24 leaders, the more successful I can become.

25 Guys, hope you have a great day. This is

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1 Brandon Boyd, a leader at iML. Have a great day,
2 everyone.

3 (The video recording was concluded.)

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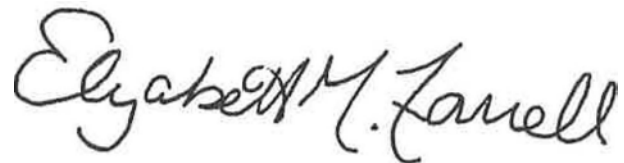
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| PAGES | 1 THROUGH 7 |

SECRET WEAPON

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SecretWeapon

IM Mastery

9/5/2023

1 FEDERAL TRADE COMMISSION

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SecretWeapon

IM Mastery

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1 P R O C E E D I N G S

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3 Secret Weapon

4 (Music playing.)

5 ANNOUNCER: What are you doing right now?
6 Are you clearing the path of wealth and a lifestyle
7 most dream of? Did you save enough to retire, enjoy
8 life and take care of your health? Do you have enough
9 to take care of your family? Why not enjoy your life
10 now and make massive money, enough to enjoy later,
11 also? Yes, now.

12 You can be as successful as a Wall Street
13 trader without spending years to acquire knowledge
14 and, most important and unlike Wall Street traders,
15 you do not have to sit at your desk all day long. You
16 can actually leverage their time and expertise hands-
17 free.

18 Today, iMarketsLive brings you market
19 expertise in a set of packages you cannot ignore and
20 you simply cannot refuse.

21 We offer you the unique opportunity to
22 benefit from a unique and powerful system that
23 combines future signal services, Forex signal service,
24 and live trading and educational services. When
25 opportunities present themselves, just link our master

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1 account to your client and watch our signals coming in
2 and doing the work for you in less than a second. Our
3 expert execute a trade, and with our signal services
4 application, you can instantaneously mirror their
5 trade execution.

6 The best part is you can start off with a
7 real-time practice account and you never risk a dime
8 of your own money. If and when you are ready, turn on
9 a live real-time account and earn profits.

10 With iMarketsLive, you can learn while you
11 earn, study at your own pace, and be mentored by the
12 best industry traders and educators. We offer you the
13 unique opportunity to benefit from a unique and
14 powerful system that combines future signal services,
15 Forex signal services, and live trading and
16 educational services. If you have time to work and to
17 learn, then there's no better education than this.
18 Not only it pays for itself, but you can actually
19 profit from it.

20 Enter a new world of trading skills. Get
21 exact insight of what markets, what patterns and why
22 they are taking a trade. Get a front row seat to
23 success each day.

24 Start doing the right thing today to reap
25 your benefits tomorrow. If you have no time and need

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1 a Plan B to secure your wealth, trust our
2 professionals to create a legacy. In time, you might
3 forget what was that Plan A all about.

4 Isn't this the best news you've received in
5 years? Well, isn't it? We thought so.

6 (The video recording was concluded.)

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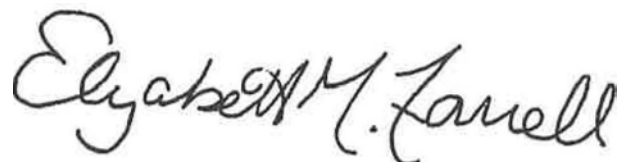
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Attachment P



imaustingodsey • Following
Lisbon, Portugal

...



imaustingodsey And just like that we in Madrid, Spain..... ✈️👉👊🇪🇸
I'm so happy and grateful now that... 🙌🌈🌺🌻 •GV has 37 Chairman in the world... 🌐
•I'm serving at least 7,300 clients on Socialblerr and there is no competition for Instagram marketing companies at all lol... 📱
•I've traveled to 50+ countries and Aiden has to 20+... 🌐
•My mother is fully healthy and healed... 🙌
-2+ years fully Vegan and Plant Based.... 🥑
•My ex's regret acting funny and not seeing the vision... 🙌
•1,500+ Global Visionariez on my team are coming to Unleashed in Vegas... 🏰



11,793 likes

JANUARY 28

Add a comment...

Post

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PX17

001030



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•Aiden has Chairman 25..... 🤔
•I've enrolled over 1,000+ customers in IML thru my career..... 📈
-I've cleared \$3,000,000+ in my career in IML..... 💰
-My first IVbar location has successfully launched in Miami..... 🌱
•I have 12 units for my Airbnb biz..... 🏠
•All my friends are not dead no, lol they are all indeed crushing life and living it to their fullest potential... ❤️
•My Book "The Blueprint" has released, and sold over 12,000+ copies and gone best seller... 📖
•I'm a Chairman 250 in Imarketslive... 🍔 By May 17th, 2019 at 11:59PM... 🌙
👉👉 #TradeTravelManiiiiifist
#AffirmAndTakeAction
#ItOnlyWorksIfYouWork

25w



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JANUARY 28

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Learn How Noreen Quit Her Job 8 Mo. Ago, Paid Off her Debts AND the Rest of Her House with the IMLWA

1,830 views 48 likes 1 comment SHARE SAVE

Steven Hooley
Published on Feb 17, 2019
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If you have any questions, or if you have your own testimonial video to submit please email imlwebanalyzer@gmail.com
Category: Education

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Charlene P 4 months ago
Congratulations Noreen!!! I'm next! I feel that the skill that I've learned from ILM Academy, other educational tools and self education has been priceless in paving the way for me to live the life I know I deserve. I quit my part-time job and now trading full-time. I have other really good income which is a blessing but THIS...will afford me the opportunity to pay off my home by years end!
Read more
1 like 1 reply

Jermaine Strachan 4 months ago
Good stuff...congrats Steven, Im really impressed by your work. My only problem is focusing on one product of IML lol
2 likes 1 reply
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labhe112666 2 weeks ago
I love the web analyzer
1 like 1 reply

Dwayne Robinson 4 months ago
whats the strategy being used?
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Aplan4u 4 months ago
She's Winning!
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Rafael Diaz 4 months ago
Is sheriff strategy?
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Mohamed Ahmed 4 months ago
Great
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IML Web Analyzer Testimonials
Steven Hooley - 16 / 23

- 14 C. - Profits on Live Trade! Steven Hooley 3:49
- 15 IML Web Analyzer Testimonial - Shantá S. - Boss Mom Loves Making Money Steven Hooley 2:13
- 16 Learn How Noreen Quit Her Job 8 Mo. Ago, Paid Off her Debts AND the Rest Steven Hooley 16:17
- 17 David Came Shares How He's Winning With the Web Analyzer! Steven Hooley 1:01
- 18 Denise Shares How She Gets a 98% Profitability Rate with the Web

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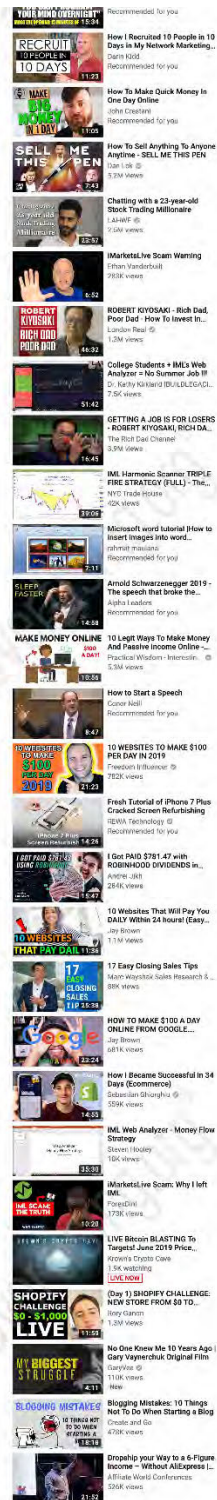
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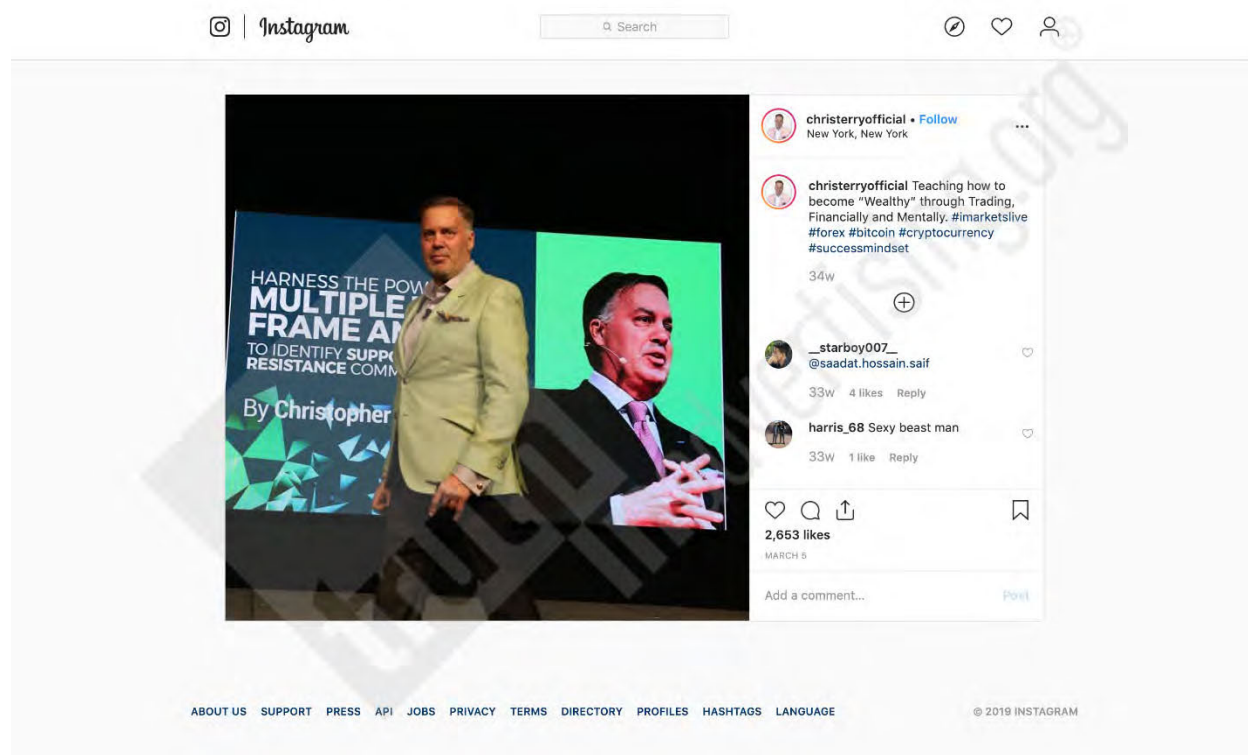
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Jason Brown is at Miami Design District.

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March 21 · Miami, FL · 🌐

Don't quite know why I bought myself a lambo and a condo 😂😂😂

I'm barely home... but I've always been about whatever it takes to help my team WIN BIG 💰💰

Serving others = self fulfillment 🗝️👊

Let's RUN, see you around the world 🌐

SECOND QUARTER Sprint

- SAT. MARCH 23RD
- ARIZONA
- SAT. MARCH 30TH
- DALLAS, TEXAS
- APRIL 14TH-15TH
- DUBLIN, IRELAND
- TUE. APRIL 16TH
- BRNO, CZECH REPUBLIC
- WED. APRIL 17TH
- PRAGUE, CZECH REPUBLIC
- MON. APRIL 22ND
- AMSTERDAM, NETHERLANDS
- MAY 4TH-5TH
- TORONTO, CANADA
- MAY 6TH-7TH
- NEW YORK CITY
- MAY 8TH - 9TH
- NORTH CAROLINA
- MAY 10TH-11TH
- HOUSTON "TAKE FLIGHT"
- MAY 16TH-17TH
- EL PASO, TEXAS
- SAT. MAY 18TH
- LAS VEGAS, NEVADA
- SUN. MAY 19TH
- LOS ANGELES, CALIFORNIA
- MAY 21ST-22ND
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- MON. MAY 27TH
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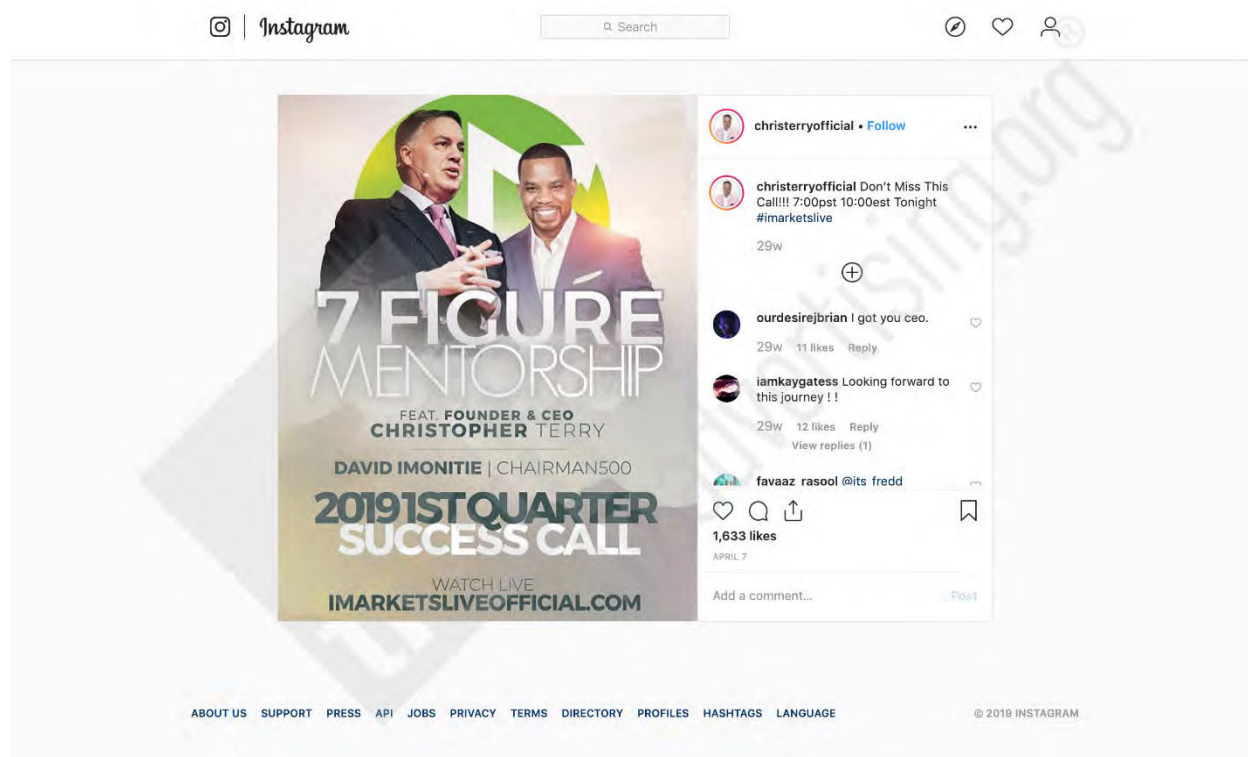
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Get Ready Your time has come and The crypto king @d_dubya27 will be there to break down how he was able to send his daughter to college all from TRADING 📈 not to mention he's done ***** trading #LevelUpSzn #linkinbio Get started ASAP #ThesauceisDripping

9w

oilynursern 🔥🔥🔥

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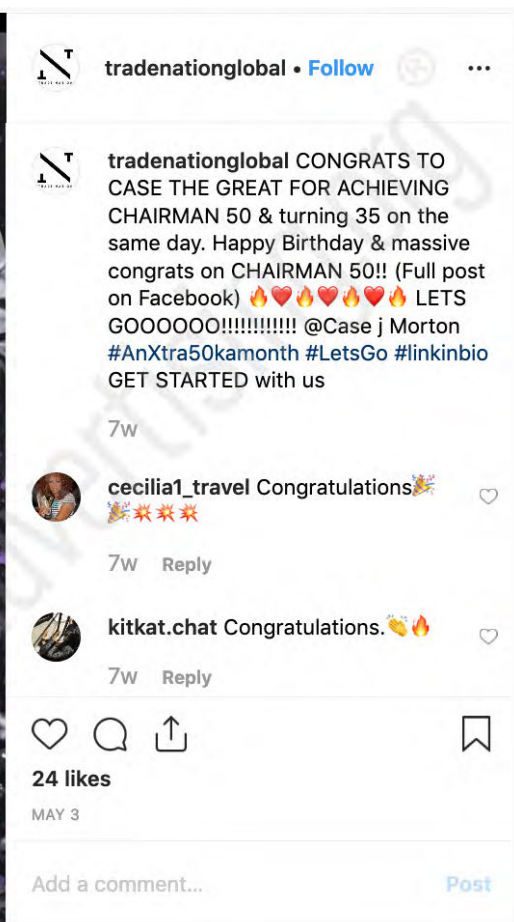
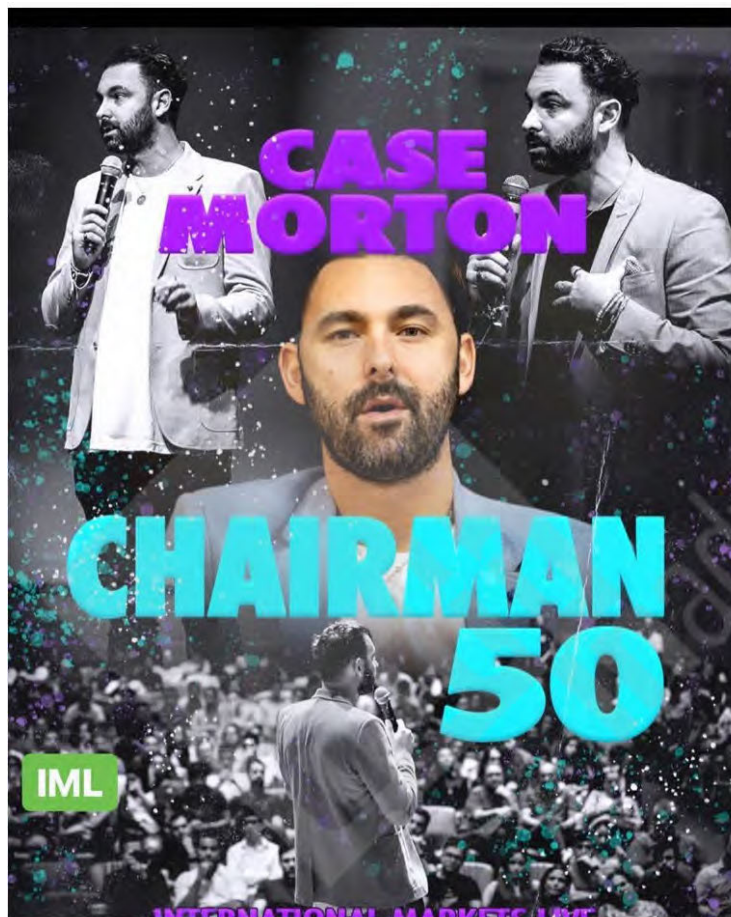
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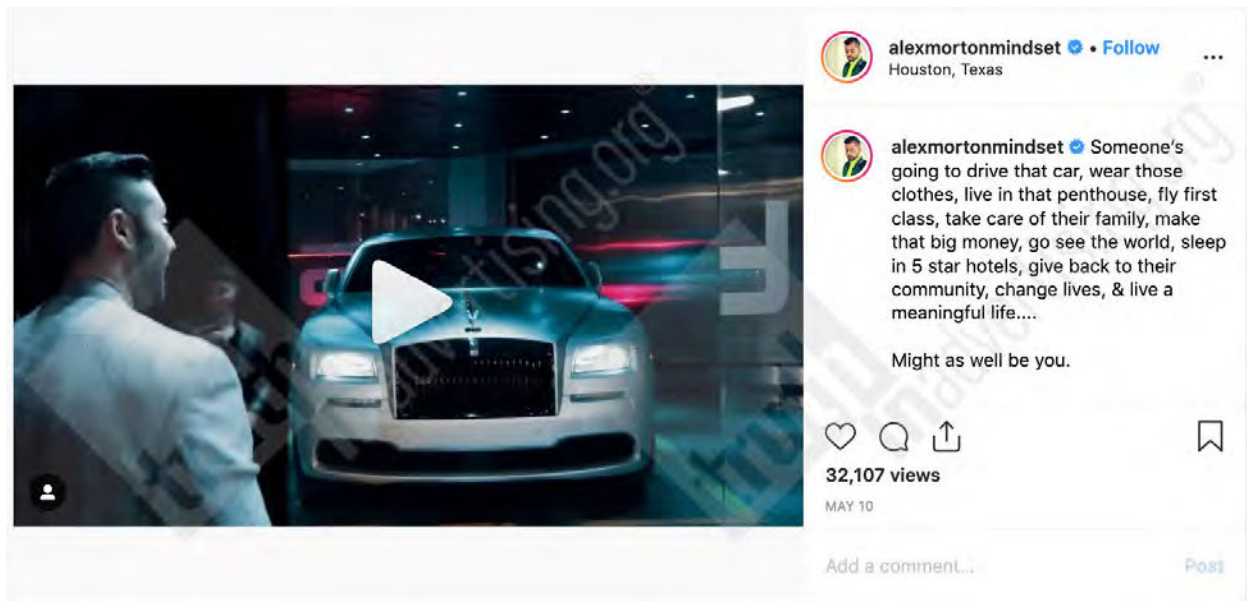
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Life's crazy man... 9 years later traveling the world helping people elevate their lives.. giving my family anything they want, doing whatever I desire. Sometimes I pinch myself to make sure this is real life & not a super long dream.

I love you guys... never give up on your dreams. & also don't let EGO hold you back from your blessings.

In early 2016 I got on my knees, prayed, and asked GOD for one more opportunity. I told him that I would be humble, celebrate others, take no credit, & operate with total love.

90 days later my opportunity showed up on my doorstep. I stayed humble, I kept my ears and heart open. I didn't



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kept my ears and heart open, I didn't walk into that meeting as "The kid who's face is on a billboard at the PHX SUNS arena and made \$3,000,000 at 26 and was a big shot."

I walked in there as a normal dude just looking for another chance. When you're humble & willing to give God the credit, he'll bless you're life.

Little did I know that THAT meeting would lead to levels of greatness, lifestyle, & success I used to dream about at 16 watching Entourage with my homies in Bexley Ohio.

Don't give up // stay humble.



17,956 likes

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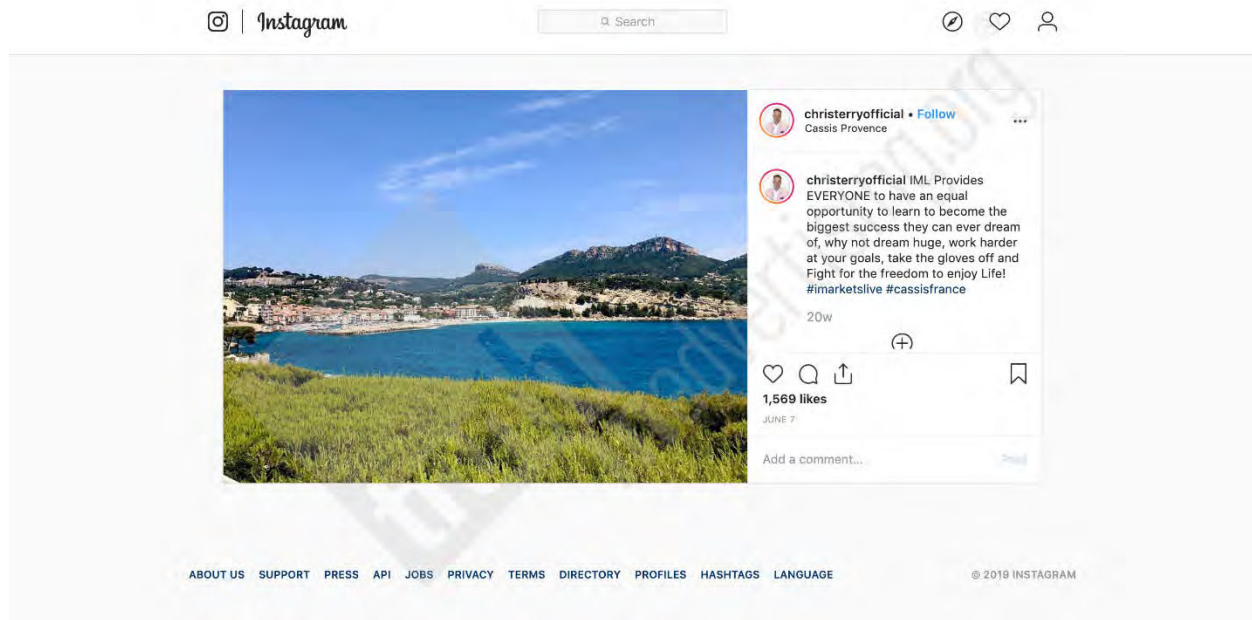
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I member 1 of my teachers my senior year of high school had a sit down talk w me as I was on the verge of failin again my 4th year in a row n needin to go back to school AGAIN for a 5th year ("Super Senior" smh) if I wanted to graduate highschool n receive my



8,313 likes

1 DAY AGO

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graduate highschool n receive my diploma.. At that exact moment I was living at my boy Jim's house, off n on homeless since 16 at this point I was stayin w him n his family ina crib of 8 ppl with only 3 small bedrooms, I slept in Jim's room w his little brother n it was maybe maybe like 10x8 feet with a bunk bed, I slept on the hardwood floor w barely any space n would get stepped on every night when they would use the bathroom lol, w just a blanket under me 4 months in the



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middle of winter cold asf. I had a part time job ata grocery store down the road, All I wanted was to save alil cash n get my shit together, I found a 1 bedroom spot in the hood for \$1,350 down(\$450/monthly first/last/security). I was makin \$7.15hr pushin carts, baggin food, takin out trash, stockin shelves everyday. I was jus grateful I hada job n spot to sleep. 🏠🌧️

So anyway my teacher showed me a



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chart after class 1 day pullin me aside, in the average incomes bracket of education it stated "High School Drop Out" at the top of the list for lowest amount of income \$15,000 per year, she asked "how are you GOING to take care of a family, raise children 1 day, travel the world".. She reaffirmed n tried instilling in my belief if I didn't go on to be a "Super Senior" n get my diploma I wasn't gunna be really successful and make 2 much money in life. "Numbers don't lie" she said



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life, "Numbers don't lie" she said "look". Well I dropped out that week, didn't ever get my diploma, didn't ever talk to that teacher again, didn't believe the "truth" she told me, quit my job, I didn't end up gettin the spot or savin up the full \$1.35k. 🎓👉

I usedta pray on how all of the puzzle pieces would eventually come together and how all the hard work would pay off years later.. Well idk if they have yet but this spot @orlandomiller4 and I



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yet, but this spot @orlandomiller4 and I just got is worth \$1.35 million.. Sheesh... God is Clever.. 🙏💯

#ThankYouJim
#IHateWearingSocks

1d



adriana.egued FIREEEE 🔥

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jbrown Network Marketing... the best profession in the world 🏆 Is it easy, no... do people say it's easy, yes... is it illegal, no... do people judge it before getting the facts, yes... But regardless of all the opinions and noise, the beautiful part about our profession is that we give the average person a realistic avenue to create \$500-1000 a month extra income, part time (results not typical) 🙌 Where else can people without degrees and people with doctorates come together... where else can someone come from Penn State University or the State Penitentiary and have the same opportunity... where else can you travel the world, make incredible friendships and earn money residually while doing it 🏆 Sept 4, 2013



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El Paso, Texas

I was broke, busted and disgusted... I was tired of working for other people just to get told what to do and make the same money as the lazy co-workers I had to look at every day... I am not down on jobs, I am so grateful for the jobs my parents worked to provide and put food on the table for me when I was growing up... but I never want to repeat the 40-50 years of hard work that they had to go through... network marketing gave me that freedom, that flexibility... because of this profession I have traveled to 42 countries at the age of 29, impacted hundreds of thousands of people, retired my parents, given to my church and earned millions myself... where else could a small town kid, who used to be bullied, made fun of and left out, who had average grades at best and no



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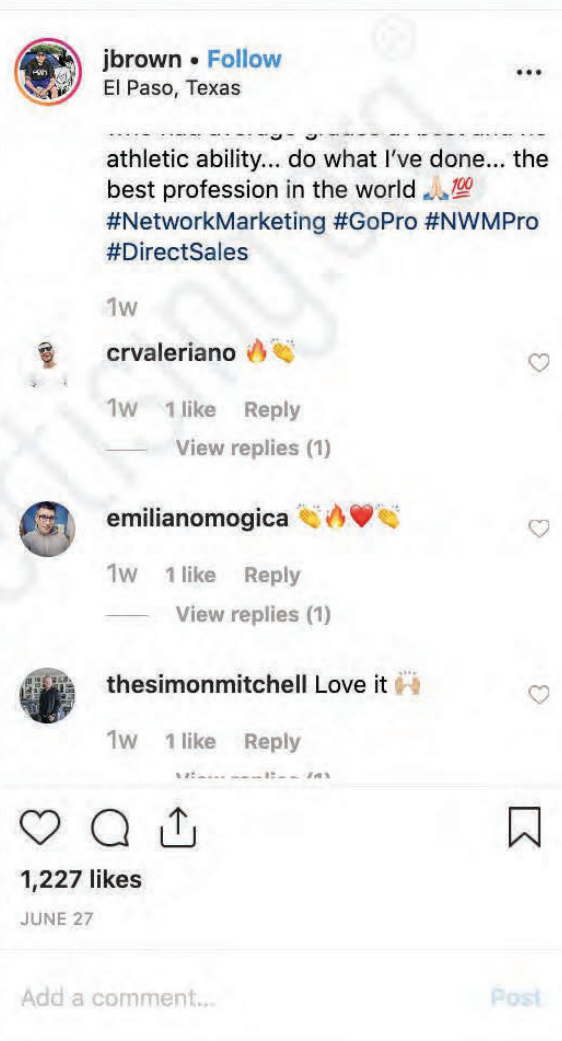


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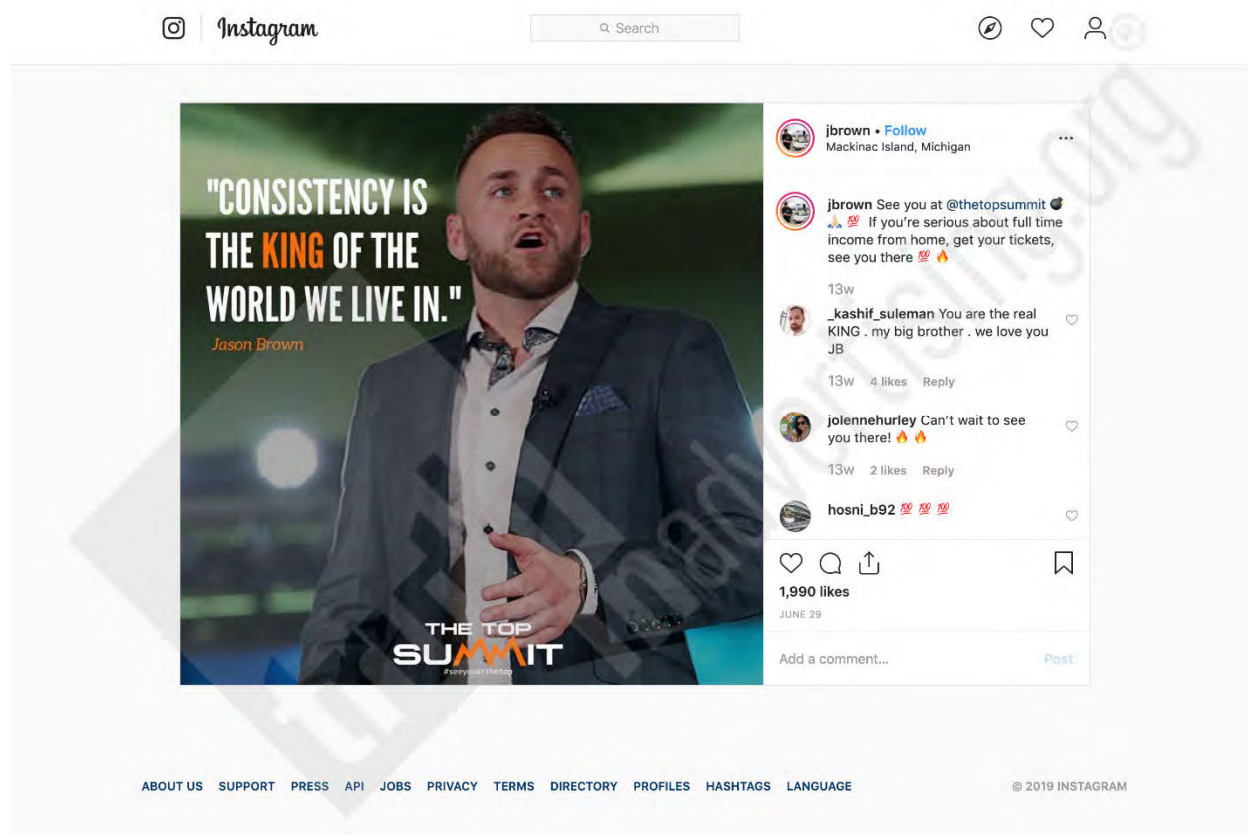
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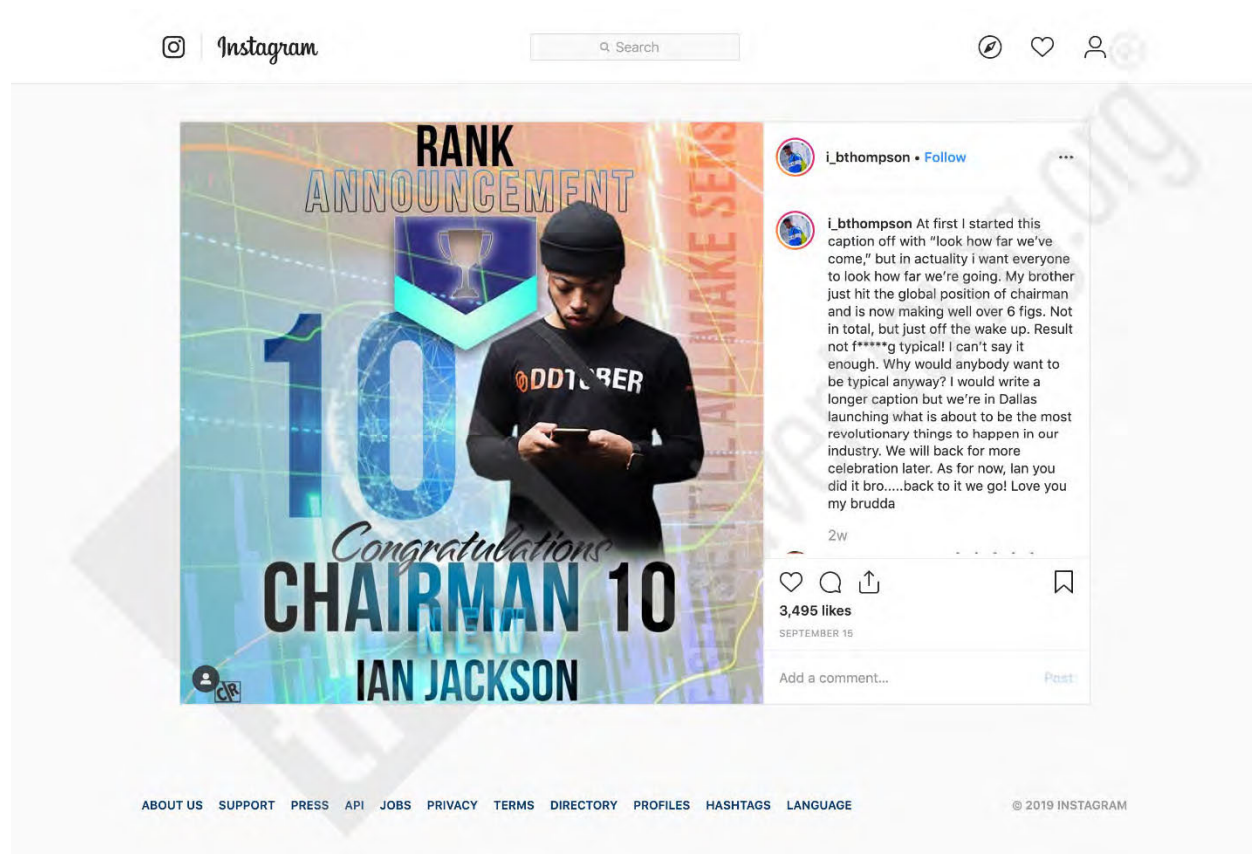
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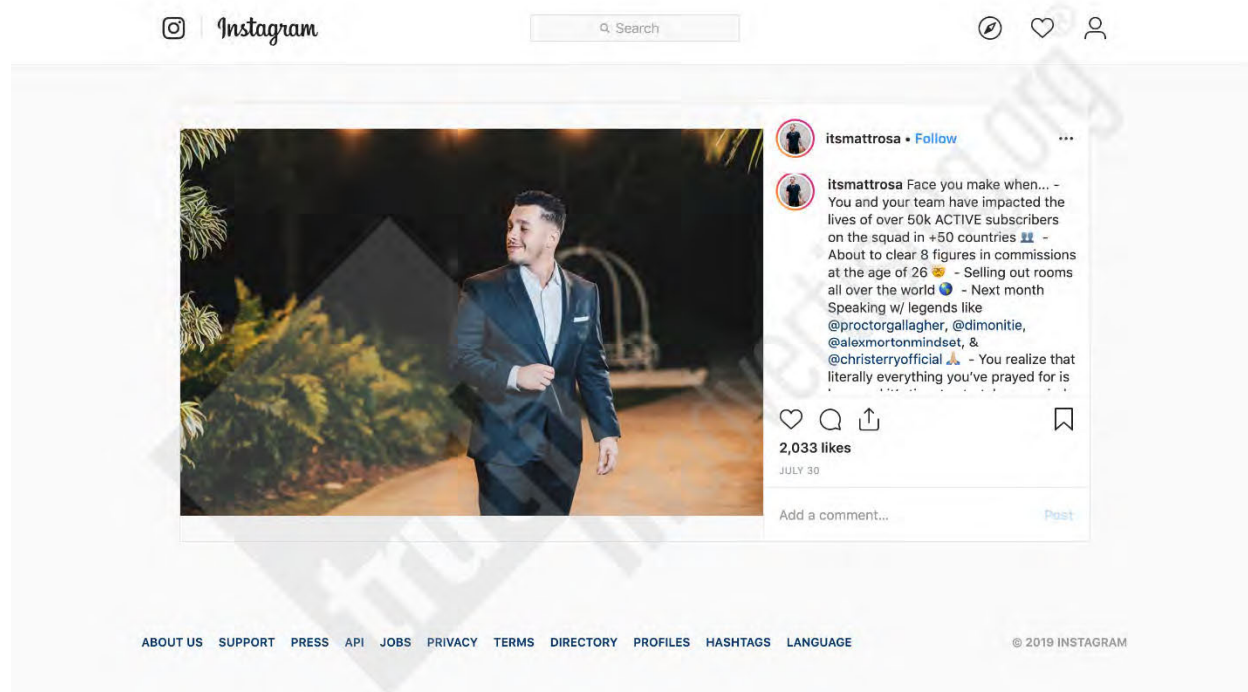
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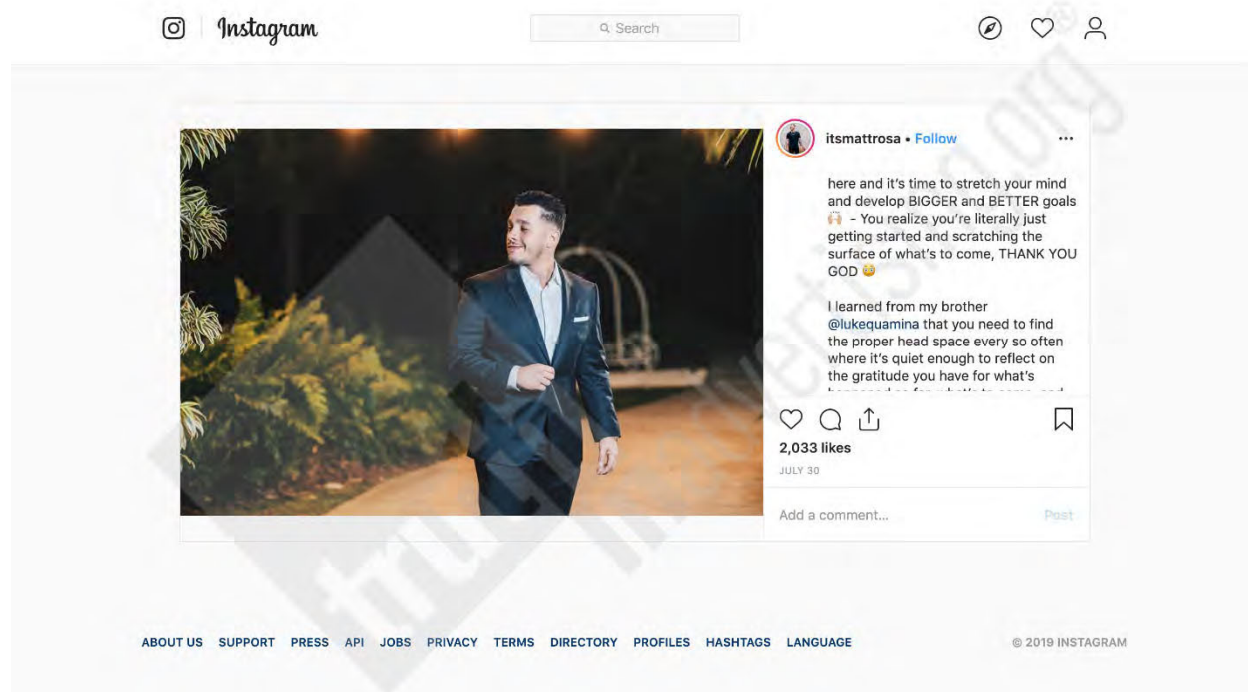
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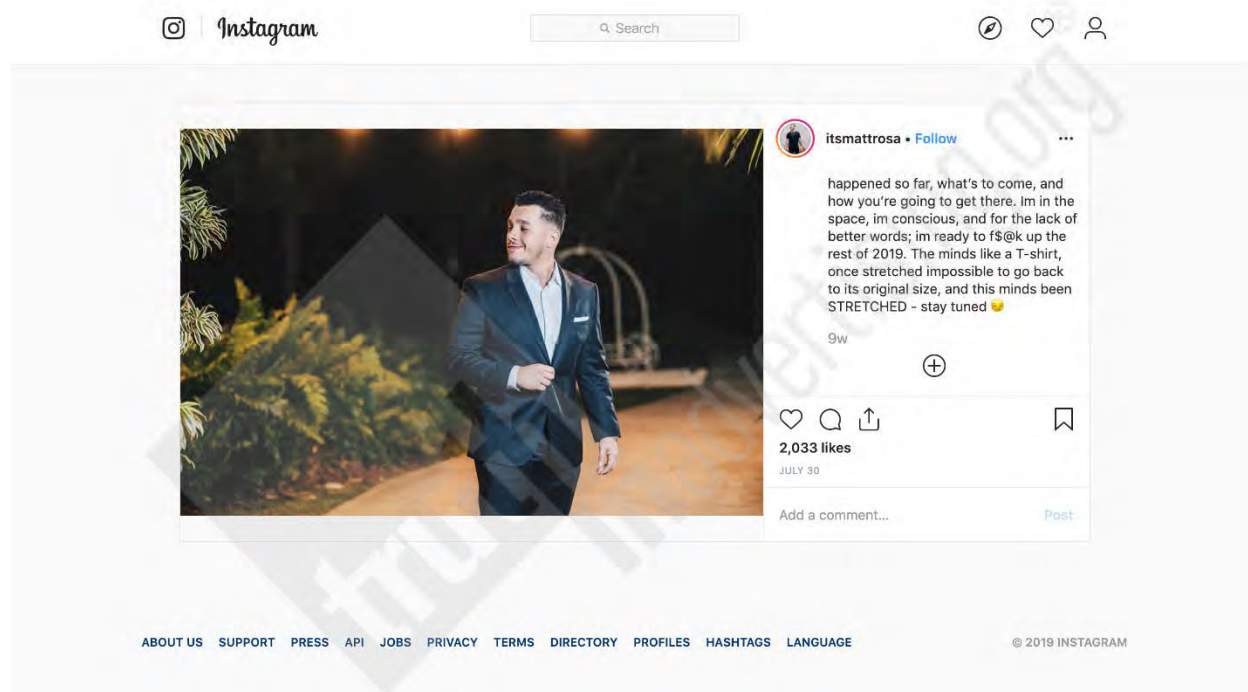
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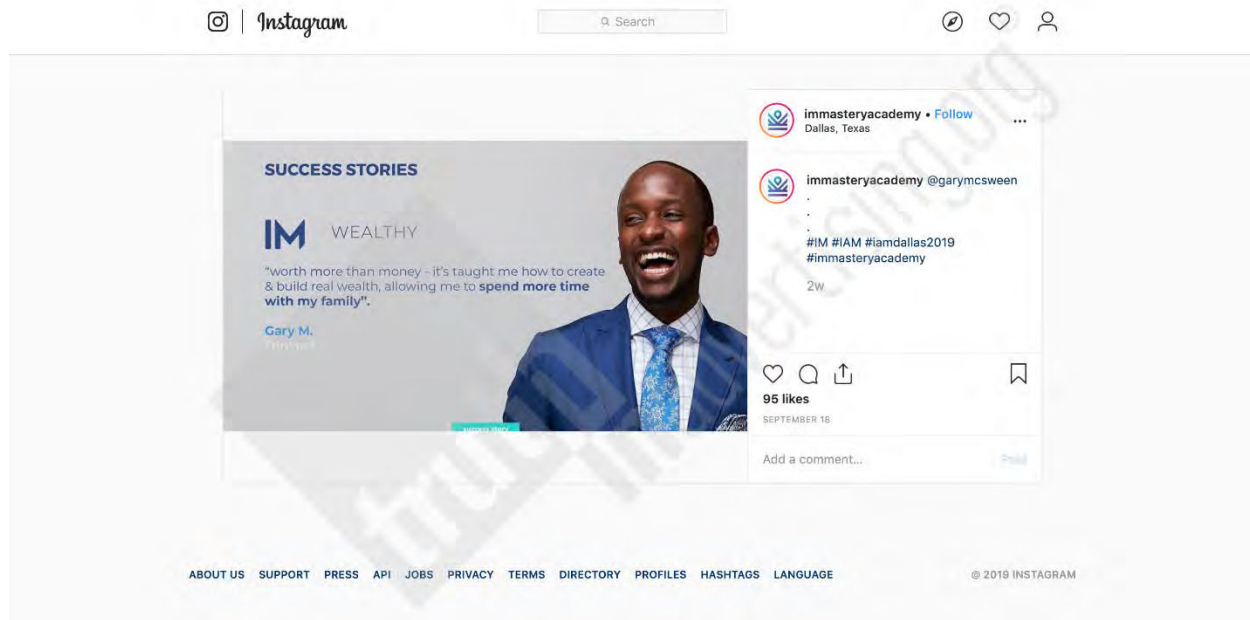
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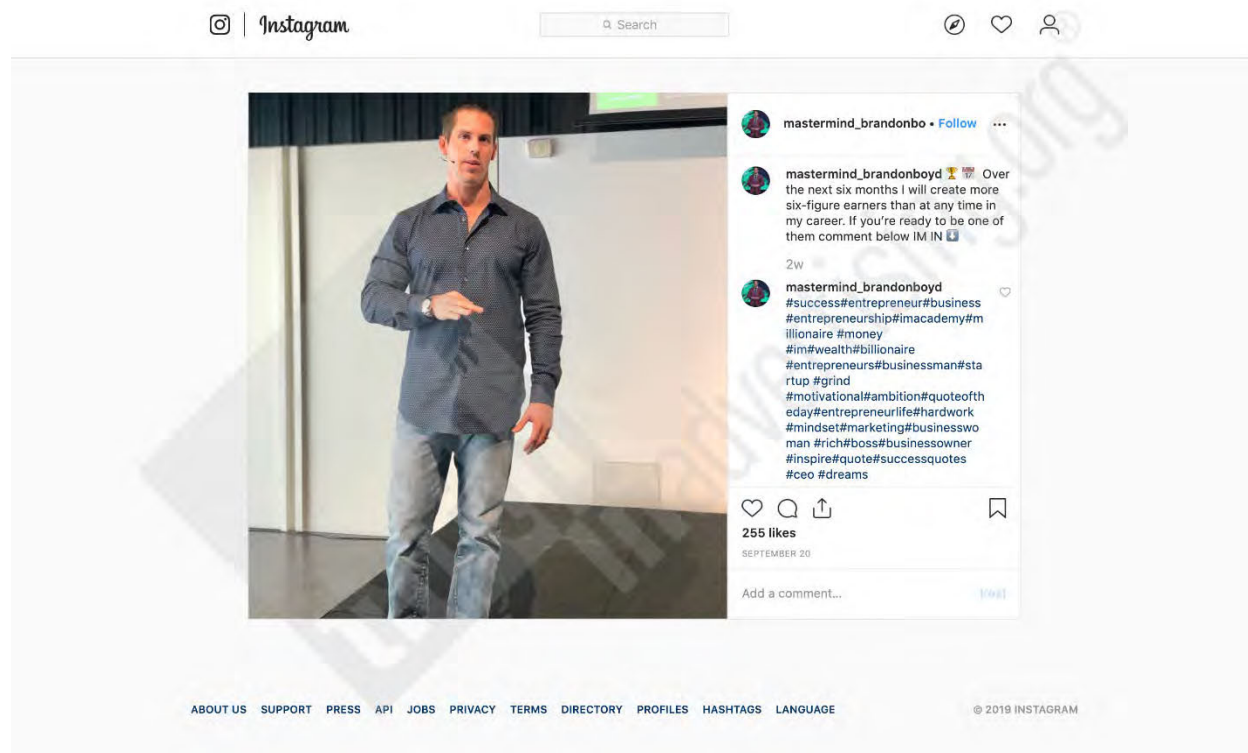
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DATE RECORDED: FEBRUARY 17, 2019
TRANSCRIBED: AUGUST 29, 2023
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1 P R O C E E D I N G S

2 - - - - -

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4 STEVEN HOOLEY: Go for it.

5 NOREEN MATOVINA: The web analyzer is my
6 absolute favorite software tool that iML has to offer.
7 I've been using it since I started and they do a ton
8 of products and I was checking them all out, but my
9 heart is with the web analyzer and it is the only tool
10 that I use for iML.

11 I can't -- I love how the -- it gives you
12 high probability trades. You put a strategy in that
13 you master and my suggestion that anybody is you
14 master one thing. You don't want to be all over the
15 place. In the beginning I was, but I just said I had
16 to focus and I focused on the web analyzer and the
17 strategy I chose and within six months, I was able to
18 quit my job. It was a full-time corporate job with
19 benefits, bonuses, paid vacations, the whole nine
20 yards, but I was miserable. Absolutely miserable.

21 So I just stuck it out and was determined to
22 learn how to do this and with the web analyzer tools
23 you are given, it was just so easy, and within six
24 months, I made more than I could make working six
25 months. So I knew it was time to quit and do this

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1 full-time.

2 And it was a no-brainer for me. It -- you
3 know, joining iML is about 250.

4 STEVEN HOOLEY: Yeah.

5 NOREEN MATOVINA: My daughter's tuition is
6 -- it was \$40,000 a year and the education I got, it's
7 second to none, and I'm always learning, I'm always a
8 student. So I was -- if you think about it, you could
9 get your two and it's free and you don't pay nothing
10 -- anything and you're -- you're getting the best
11 education of your life. Or even if you don't want to
12 get two, it's about \$8 a day. It's less than a pack
13 of cigarettes for most states to get this education
14 and grow your income and be happy.

15 I was -- like I said, I was miserable at my
16 job. I was nervous and scared, but I knew that this
17 was the only way I was going to be able to break free
18 from being miserable.

19 STEVEN HOOLEY: That's amazing. So let's --
20 let's talk about your trading with the web analyzer.

21 NOREEN MATOVINA: Yes.

22 STEVEN HOOLEY: So what -- how often do you
23 trade? What -- what do you do -- how do you think
24 your win ratio is, what pairs do you like to use?
25 Like, is this -- would you say this is good for a

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1 brand new person and an experienced person?

2 NOREEN MATOVINA: Yes, I would say it's
3 definitely good for both. I trade five days a week,
4 Monday through Friday, and I trade for maybe two to
5 three hours a day and I take three to five trades a
6 day. And my win ratio, I have it down to about --
7 between 80 and 85 percent, I would say, is my win
8 ratio. I -- some people do a PIP value every day. I
9 do a dollar amount and once I hit it, I'm done. I was
10 obsessed at first, just learning. I'd stay on it all
11 day long.

12 But then, you know, I got discipline and got
13 -- you know, you master your strategy and two, three
14 hours a day and I'm done and get on with my life and I
15 can do whatever I want, whatever I want, whenever I
16 want.

17 STEVEN HOOLEY: So you could go trade from
18 the beach if you wanted?

19 NOREEN MATOVINA: Absolutely. Anywhere, any
20 time.

21 STEVEN HOOLEY: Yeah. Now -- now you said
22 80 to 85 percent. You -- so just so people know --

23 NOREEN MATOVINA: Yeah.

24 STEVEN HOOLEY: -- when I calculated what
25 Noreen told me, it was actually 87, almost 90 percent.

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IM Mastery

2/17/2019

1 So either way, anything above 80, just so anybody
2 listening to this knows --

3 NOREEN MATOVINA: Yeah.

4 STEVEN HOOLEY: -- anything above like 60 to
5 70 percent is considered stellar in the industry
6 because you're net positive. So anything above 80 is
7 like, how are you doing this?

8 NOREEN MATOVINA: Right. Ah, I just
9 perfected my -- the strategy I use and --

10 STEVEN HOOLEY: Mm-hmm.

11 NOREEN MATOVINA: -- I had to learn patience
12 and I wait for the trades to come to me. I -- I watch
13 the web analyzer, I see the trades come in, I see if
14 they match my strategy. If they do, I'm in; if they
15 don't, I just want for the next one. It's that easy.

16 STEVEN HOOLEY: Beautiful. So it sounds
17 like you -- you would agree that anybody can do this
18 whether you've got no experience, you've got
19 experience, and I think you've laid out really well
20 what it takes to be somebody who's quit your job using
21 the web analyzer. Now, obviously, these results
22 aren't typical. You know, not everybody does this.

23 NOREEN MATOVINA: No.

24 STEVEN HOOLEY: This is a very special
25 thing. You have put six months, you said, into this.

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1 Six months is not too long to quit your job --

2 NOREEN MATOVINA: No.

3 STEVEN HOOLEY: -- once you think about it,
4 but it was -- it was a lot of hard work. I know, you
5 know, from what you've said, it was a lot of hard
6 work. But still, I mean, that's -- results not
7 typical. Your results may vary if you're watching
8 this, but Noreen is literally showing you what is
9 possible.

10 NOREEN MATOVINA: Yeah.

11 STEVEN HOOLEY: Right?

12 NOREEN MATOVINA: Yeah. And no -- we're not
13 saying everyone has to quit their job or anything like
14 that, but, you know, to have that extra income or
15 money for your retirement or just to do extra things,
16 if things happen, medical bills, cars, things break
17 and you need them and you don't have to like worry
18 about how that's going to happen.

19 And my thing, I do have to say this, is you
20 get the demo. So you demo and you practice, practice,
21 practice. So I was -- I'll be honest with you, when I
22 first did it, I went live way too fast, blew my money.
23 I said, okay, focus, no more money until I win 100
24 trades in a row. I had to win 100 trades in a row
25 before I was going to go live again with my money.

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1 STEVEN HOOLEY: And you did that?
2 NOREEN MATOVINA: And I --
3 STEVEN HOOLEY: You actually did that?
4 NOREEN MATOVINA: Yes.
5 STEVEN HOOLEY: Wow. That's incredible. So
6 you made yourself stay disciplined enough to win 100
7 trades in a row before you --
8 NOREEN MATOVINA: In a row.
9 STEVEN HOOLEY: -- before you went and quit
10 your job.
11 NOREEN MATOVINA: In a row.
12 STEVEN HOOLEY: That took you six months to
13 do?
14 NOREEN MATOVINA: Yes, yes.
15 STEVEN HOOLEY: Wow. Okay. So --
16 NOREEN MATOVINA: I'm talking if you get to
17 a 60 in a row and you lose one, you got to go back --
18 STEVEN HOOLEY: Yeah.
19 NOREEN MATOVINA: -- and start over.
20 STEVEN HOOLEY: Right.
21 NOREEN MATOVINA: Yes.
22 STEVEN HOOLEY: Right.
23 NOREEN MATOVINA: Yeah.
24 STEVEN HOOLEY: And so you exercised that --
25 wow, that's amazing. I mean, if you think about it, I

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1 mean, you could teach your daughter this and she could
2 pay for college if she wanted to with this. What's
3 your -- what's your life like, Noreen? What -- you
4 quit a cushy job. You quit a corporate cushy job.
5 And for those of you watching this video and you don't
6 know what that means, I've had a corporate cushy job.
7 You're paid well.

8 NOREEN MATOVINA: Yes.

9 STEVEN HOOLEY: You sit in a nice air-
10 conditioned room at a nice desk. You have duties, but
11 you know what to do every day and a paycheck that
12 comes in every week or two weeks or every month and
13 you know what to expect. Benefits --

14 NOREEN MATOVINA: (Inaudible) them.

15 STEVEN HOOLEY: I didn't quit -- yeah, I
16 didn't even quit my job. And so I could have enough
17 money to very well replace those benefits because
18 benefits, health, dental, vision, that gets expensive.

19 NOREEN MATOVINA: Very expensive.

20 STEVEN HOOLEY: Right. And good corporate
21 jobs, they pay very, very nicely for benefits.

22 NOREEN MATOVINA: Yeah.

23 STEVEN HOOLEY: They cover a good, good
24 portion. So what's your life like now? You are -- my
25 understanding is that your -- your biggest income that

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1 you're living off right now is the web analyzer. So
2 that means you have to generate enough money for those
3 benefits for life, for cars, for everything you just
4 named, everything. What's your life like?

5 NOREEN MATOVINA: So my life is good. I
6 like trading early, so I get on it pretty early, and I
7 trade for a while. I always get on, you know, an iML
8 education session and I do look and see what everyone
9 else is doing, but I just -- it's just I just go back
10 to the web analyzer. I always -- it's just the only
11 thing that I enjoy, but I know there's a hundred --
12 there's great products and -- but this is the one that
13 I love the best.

14 I was able -- I don't know, I'm a big animal
15 person, and when I was working, I personally wouldn't
16 get a dog because I was away for 12 hours a day. And
17 my big thing is I got my boy, Bentley, and he's the
18 love of my life and he makes me very happy.

19 STEVEN HOOLEY: Wow.

20 NOREEN MATOVINA: Very happy. I volunteer
21 at the shelter. I couldn't do that before. I walked
22 the dogs, took care of the cats, things I like doing.
23 I am disciplined. I don't sleep until I want to. I
24 do have to get up and get on and trade. But the rest
25 of the day is mine. And --

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1 STEVEN HOOLEY: (Inaudible) --

2 NOREEN MATOVINA: -- I don't have these
3 bosses, these micro-managing -- that's why I couldn't
4 stand it, like, uhhh, like I had to break free and --
5 I'm free. I am a free being.

6 STEVEN HOOLEY: Right. Because you do what
7 you want, right? You do what you want every day.

8 NOREEN MATOVINA: What I want.

9 STEVEN HOOLEY: I mean, you have some
10 discipline. You know you have to trade, but you can
11 -- like you said, you can go to the dog shelter. You
12 have freedom, time --

13 NOREEN MATOVINA: Yeah.

14 STEVEN HOOLEY: -- freedom. That's --

15 NOREEN MATOVINA: I could go to the dentist.
16 I don't have to take a sick day. I could, you know,
17 go to the bank when I need to. When you're working
18 like that much and -- especially if -- you know, my
19 kids are grown and you -- people who have kids and
20 children, it's so much. It's like overwhelming. And
21 I do have to say, learning this, I was getting up
22 extra early before work to learn this. I was staying
23 up later because I was determined because I knew that
24 I was going to have a better life once I learned how
25 to do this, the web analyzer.

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1 STEVEN HOOLEY: And would you say you have a
2 better life now? Do you live comfortably?

3 NOREEN MATOVINA: I definitely have a better
4 life now.

5 STEVEN HOOLEY: Yeah?

6 NOREEN MATOVINA: I mean, I was in a really
7 -- to be honest with everyone, I was in a really dark
8 place when I was at work. Like I was pretty depressed
9 and miserable, and it -- like I -- I'm going to start
10 crying on this video, but it like -- it really -- it
11 saved my life. It saved my life.

12 STEVEN HOOLEY: And now -- now you can
13 generate your -- that's amazing, by the way. And I
14 think everybody watching this really can feel how
15 you're feeling right now. Would you say that you no
16 longer have to wait for a boss to pay you your
17 paycheck? You can generate whatever money you want,
18 right?

19 NOREEN MATOVINA: Yeah.

20 STEVEN HOOLEY: I mean, within reason.
21 Within reasonable expectation.

22 NOREEN MATOVINA: Within reason, yep, yeah.

23 STEVEN HOOLEY: Yeah, you're in charge of
24 your income, right?

25 NOREEN MATOVINA: Yes, I am.

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1 STEVEN HOOLEY: How does that feel?

2 NOREEN MATOVINA: Yeah. And I -- you know,
3 I just take out what I -- I just take out what I need
4 monthly to like pay my bills and I leave the rest and
5 build my account -- I do more than one account.

6 STEVEN HOOLEY: (Inaudible).

7 NOREEN MATOVINA: I do more. And that's the
8 beauty of this. There's so many options. And like I
9 said, \$8 a day. That's if you -- if you don't want to
10 get your two, you get it for free. I mean, it's just
11 mind-blowing. And then people like make excuses. Oh,
12 I don't have time, I'm tired. Well, you're always
13 going to be tired working a job and, you know, having
14 people in your ear and do this and do that. And I'm
15 not tired anymore. I'm not sad anymore. I'm not
16 miserable anymore. I'm not stressed -- stressed
17 anymore. It's been pretty great.

18 STEVEN HOOLEY: That's amazing. So you --
19 one thing I want to touch on before we end this video
20 is you mentioned there's other products in this
21 company, you mentioned there's other things you can
22 choose. Why do you choose the web analyzer over
23 anything else? Why do you think you keep coming back
24 to it? Why -- why is this your go-to software for
25 trading and -- I know it's changed your life, but what

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1 draws you to going back to it every time you try to
2 try something else?

3 NOREEN MATOVINA: What draws me back to it
4 is I could get on it when I want to get on it and
5 there's always something that's going to be there for
6 me to set up my trades. It's --

7 STEVEN HOOLEY: Because it generates like 80
8 a day sometimes.

9 NOREEN MATOVINA: Yes. And I don't like the
10 -- the -- I mean, I like the cha-ching.

11 STEVEN HOOLEY: Mm-hmm.

12 NOREEN MATOVINA: I like that. But I'm
13 talking with other products, it's dinging and this --
14 and then you got to go look at the -- and I'm one
15 thing, I get an alert, I look at my screens and my
16 indicators and I know that that's going to be the
17 trade I'm going to take. It has the features, it has
18 the time, the -- I do the 15-minute. It has that. So
19 I just turn that on. There's so many features. You
20 can set it for what you specifically like to do.

21 STEVEN HOOLEY: That's amazing. So it's
22 easy for you. It's easy and it does what you need it
23 to do all in one place.

24 NOREEN MATOVINA: Yes, yes. I love it.

25 STEVEN HOOLEY: That's awesome. Noreen, it

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1 sounds like this software has changed your life, but
2 as someone --

3 NOREEN MATOVINA: Oh, you have.

4 STEVEN HOOLEY: Well, I was just --

5 NOREEN MATOVINA: You, the software, iML,
6 everyone's been great. Everyone's been really
7 terrific.

8 STEVEN HOOLEY: Good. I mean, I hope
9 everybody can see my big, cheesy smile because this is
10 what you -- you create software for. This is what you
11 spend the sleepless nights programming for. This is
12 what I fight for is to be able to help people like
13 you, Noreen.

14 NOREEN MATOVINA: Yeah.

15 STEVEN HOOLEY: So thank you for doing this
16 video with me.

17 NOREEN MATOVINA: Thank you. You -- you
18 have no idea how much you have impacted my life. I
19 always say that and I always tell everyone that, that
20 iML, the educators and Steven Hooley, you've really,
21 really changed lives.

22 STEVEN HOOLEY: Thank you.

23 NOREEN MATOVINA: Yeah.

24 STEVEN HOOLEY: I appreciate it very much.
25 Well, I with -- oh, by the way, Noreen, were you paid

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1 to say any of this?

2 NOREEN MATOVINA: Oh, no, no. No.

3 STEVEN HOOLEY: Okay. Sometimes people ask,

4 so I always like to throw that in there at the very

5 end, but --

6 NOREEN MATOVINA: Yeah, no.

7 STEVEN HOOLEY: -- (inaudible) --

8 NOREEN MATOVINA: Well, you -- definitely

9 one thing I am, I am not a liar and you can't -- you

10 won't be able to pay me to lie about anything. So no.

11 STEVEN HOOLEY: People know. I think they

12 can tell by the tears.

13 NOREEN MATOVINA: Yeah.

14 STEVEN HOOLEY: Okay. Well, we'll go ahead

15 and end this video. And to anybody watching, feel

16 free to reach out to Noreen on Facebook.

17 Noreen, what's your first and last name? If

18 you're comfortable with saying it.

19 NOREEN MATOVINA: It's Noreen Matovina.

20 STEVEN HOOLEY: How do you spell your last

21 name?

22 NOREEN MATOVINA: It's M-A-T-O-V-I-N-A.

23 STEVEN HOOLEY: And Noreen is N-O-R-E-E-N?

24 NOREEN MATOVINA: Right.

25 STEVEN HOOLEY: Okay. So I want everybody

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1 watching this video, if you are interested about
2 finding out more about Noreen and how she quit her job
3 and her journey and just what she does, reach out to
4 her because she can help you get involved with this
5 software and teach you what she's doing. And we can't
6 make any guarantees, but I would love to see more
7 people doing exactly what Noreen is doing. Noreen is
8 not the only one who's quit her job, by the way. Not
9 everybody does it. It's not a typical result. But
10 there are a handful of others who have quit their jobs
11 with the web analyzer.

12 NOREEN MATOVINA: Yes.

13 STEVEN HOOLEY: And I want to see more.

14 NOREEN MATOVINA: And I want people to know,
15 I am not a recruiter. I don't live off recruiting
16 money. I am a student; I am a customer. So that -- I
17 make my money off the product.

18 STEVEN HOOLEY: That's amazing.

19 NOREEN MATOVINA: Yeah.

20 STEVEN HOOLEY: All right, guys, you heard
21 it from Noreen. We're going to go ahead and sign off.
22 And thank you.

23 NOREEN MATOVINA: Sign off. Thank you.

24 (The video recording was concluded.)

25

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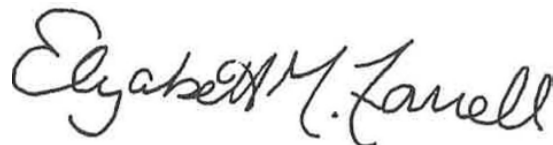
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1 P R O C E E D I N G S

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3 iML_Brandon-Boyd-Istagram_8_30_19-a-wrm

4 BRANDON BOYD: What's up, guys? We are here
5 in the United Kingdom. So excited, so awesome. I did
6 not have to ask my boss for time off. So we came here
7 to the United Kingdom. Here we've been in Poland,
8 we've been in the Czech Republic, we've been in Paris,
9 France. We said, you know what, we got the time, we
10 got the money, we don't have to ask the boss for time
11 off, we don't have to ask to leave our cubicle to go
12 to the freaking bathroom, let's go to the United
13 Kingdom. I've never been there. Heck, on top of
14 that, let's go to Amsterdam. We want to go to
15 Amsterdam, too. So we're going to Amsterdam, we're
16 going to Belgium. We're going to be doing an awesome
17 event there.

18 Guys, this is what I'm talking about. When
19 you have time freedom, when you don't have to look at
20 price tags. We didn't have to say can we afford...

21 (The video recording was concluded.)

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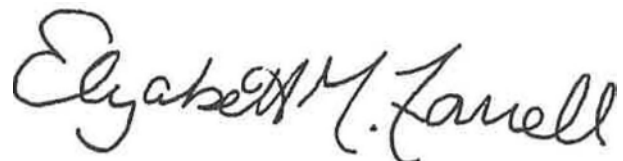
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1 P R O C E E D I N G S

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3 iML_Brandon-Boyd-Istagram_9_1_19-a-wrm

4 BRANDON BOYD: Hey, guys, what's up?

5 Brandon here from Amsterdam, beautiful Amsterdam.

6 We've been all around Europe, literally have hit

7 nearly ten countries in the time that we've been here.

8 It's been absolutely amazing. If you look at these

9 backgrounds, I want you to keep in mind as you guys

10 continue to work on your dreams, to work on your

11 goals, to work on your targets, to not give up. You

12 know, when you look at this and you think of time

13 freedom, debt freedom, financial freedom, and being

14 able to bring for yourself, your family, and others

15 the type of lifestyle that you guys are looking for, I

16 want you to look at this background.

17 Being able to go wherever it is that you

18 want to go in life, travel where you want to go -- we

19 took two countries that we had not planned to go to

20 and said, let's go, we don't care what the plane

21 costs, we don't care what the train costs, we don't

22 care what the hotel costs, let's go. We have the

23 freedom to make those decisions.

24 Was it worth it? Yes. Was it worth it to

25 wake up early? Yes. Was it worth it to attend the

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1 webinars? Yes. Was it worth it to go to convention?

2 Yes.

3 (The video recording was concluded.)

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iML_Brandon-Boyd-Istagram_9_1_19-a-wrm

IM Mastery

9/1/2019

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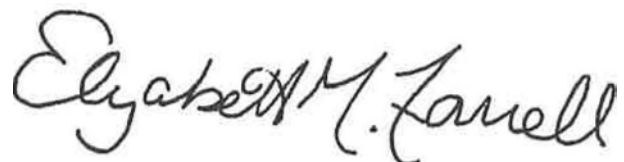
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\$7 TRILLION
Foreign Exchange Market

LIVE ON FACEBOOK &

 **@THEMOMWHOCOULD**

April 21st-30th
6:30 PM EST



Platinum Leader Jasmine Rivers
Millionaire Wealth Builders

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AJ-Rivers-IG-04_28_20-A




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TRADE WITH
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Requirements to trade:
 1. Must have a phone/tablet/laptop
 2. Must have \$235 tuition
 3. Must have a winning & coachable mindset

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themomwhocould Don't you want more out of life? Don't you deserve to achieve the goals you had as a child? It doesn't matter what the current state of your life is. It's NEVER to late to begin living your desired life.

#youshouldbetradng #forex #millionairewealthbuilders #tradehouse #tradehouseinvestmentgroup #childhooddreams #goals #dreams #howtobecomefinanciallyfree #howtomakemoney #residualincome #imacademy #recessionproof

5h








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5 HOURS AGO

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LTMastin-IG-05_03_20-i-iii



LTMastin-IG-05_03_20-i-iii



Luc Longmire
@luc_longmire



So happy and grateful, I'm now Chairman500 and I've 100,000 goldcup family around the world. I've helped create 1,000 6 figure earners while working with the elite. Comment it's done if you believe you can. [@bobproctorLIVE](#) [#goldcup](#) [#imacademy](#) [#forex](#) [#bitcoin](#)  [#investments](#) [#trump](#)



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Alex Morton IG 8/12/22

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we went to portugal

0:00 / 1:25

Purpose Through Portugal

1.4K views • Sep 3, 2022

11 DISLIKE SHARE DOWNLOAD SAVE

Jason Brown
16.5K subscribers

In today's video, we travel from country to country and land in Portugal. From Lisbon to Elvas we educate people about digital entrepreneurship and spread the value. Here is a small video showing the value, energy, and culture of Portugal. If you would like more information on what we do and how it can work for you, feel free to reach out!

Who is Jason Brown——? Jason Brown is a top-ranking NWM Leader, coach, high-energy speaker, and serial entrepreneur. From 70k in debt to MASSIVE success in a few years, Jason's journey to pinnacle leadership has been fueled by an unrelenting passion for teaching people how to find their voice and understand their self-worth.

A top keynote speaker, Jason has shared the stage with world-renowned thought leaders, including Bob Proctor, Les Brown, and many more

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Brandon-Boyd-YT-9_26_22



I'm not a financial advisor !! I ##workedhardand got the paper 📄 then I invested into ##cryptoand ##realestateand ##lookatmenow👀 Don't ##spendin ##stupidity!! find anything you consider as a ##growingassetnd ##goforit thetimeisnow #fyp

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imivanpaychecks

Ivan Paychecks · 9-29


Following

Ivan Paychecks TT 9/29/22



alexmortonmindset  • Followin ...



alexmortonmindset  I'll never forget watching a man in a red jacket expand my mind back in 2014 or so. It wasn't until THAT MOMENT I knew some how, some way, I could eventually turn (at the time) my yearly income into my weekly income. Sounds crazy I know but once you realize the power you have as a human being (unlimited) you'll expand your mind, grow your awareness, increase your actions, & have the ability to 100X your results.

January 19-22, 2023 I'll be educating people along side some very special guests on how to make your 2023 the best year you've ever had in your entire life. I waited awhile (almost 12 years) to throw my own



15,765 likes

4 DAYS AGO



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Post

Alex Morton IG 10/6/22



alexmortonmindset • Following ...

event because I didn't want to over promise and under deliver... or honestly feel like a fraud. How can you teach people how to make \$1M/5M/10M/+++ if you've never done it? You can't.

I'll be dropping the event video on 10/10 at 10:10pm eastern time right here.. & hosting a special call right before the video goes live going over details.

This event was suppose to be physically with Bob Proctor however although he won't be there physically he'll be there spiritually❤️

TEXT ME FOR UPDATES if you're in the USA/Canada.. hit the link in my



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alexmortonmindset • Followin ...

This event was suppose to be physically with Bob Proctor however although he won't be there physically he'll be there spiritually❤️

TEXT ME FOR UPDATES if you're in the USA/Canada.. hit the link in my bio and email me if you're international. Giving away a few free tickets next week.

To access the special call and discounted tickets text or email me.

480-605-1867

#BreakTheCode

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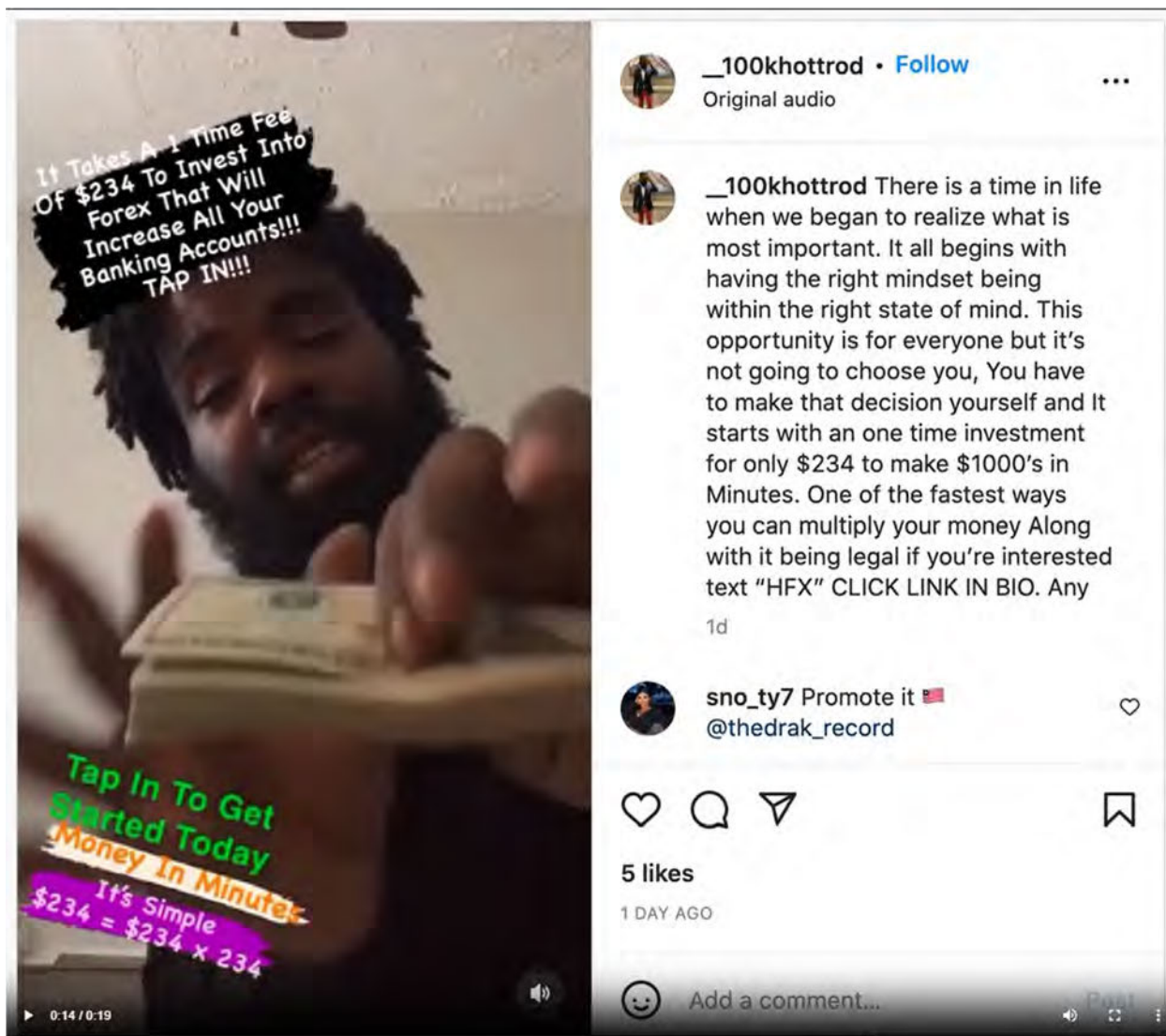
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6 MATTER NO. 2123090
7
8 TITLE IM MASTERY
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10 DATE RECORDED: MARCH 23, 2022
11 TRANSCRIBED: AUGUST 29, 2023
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13 PAGES 1 THROUGH 10
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IML_AlexM_YT_3_23_22

IM Mastery

3/23/2022

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1 P R O C E E D I N G S

2 - - - - -

3 IML_AlexM_YT_3_23_22

4 ALEX MORTON: How do I sponsor? How do I
5 recruit? How do I track? How do I build? What do I
6 do? Three steps with prospects, right? You open --
7 everybody say "open."

8 AUDIENCE: Open.

9 ALEX MORTON: You present. Everybody say
10 "present."

11 AUDIENCE: Present.

12 ALEX MORTON: And then you close.

13 AUDIENCE: Close.

14 ALEX MORTON: Okay? Number one, you're
15 going to open up the prospect, okay? There's
16 something called hot buttons. I'm going to ask the
17 right questions. I'm going to get to know him and I'm
18 going to find his hot buttons.

19 People will complain to you if you talk to
20 them long enough. People will talk about their money
21 troubles or money struggles, right? People will talk
22 about their credit card debt, their student loan debt,
23 right? You have to discover the hot buttons and you
24 do that by number three right up there, FORM, family,
25 occupation, recreation, money or motivation.

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1 One more time, FORM, family, occupation,
2 recreation, money or motivation. Okay? When you hear
3 all these stories about people sponsoring 10, 20, 30,
4 40 people in a month, even if it's on Instagram, they
5 have to be forming them at some point. You are a
6 professional problem solver. People right now, they
7 got family problems, they got job problems, they got
8 -- they can't go have fun anymore because it costs too
9 much money to go have fun. Inflation is insane.
10 People need help right now, man. Go help people.

11 Number 4, create a little pain if you need
12 to. If people are saying no to you, it's because
13 either, number one, A, you didn't do a good enough job
14 explaining to them what this really is or, number two,
15 they don't believe in themselves. It's got to be one
16 of those two. Okay?

17 So opening, diving deeper now. Everybody
18 say "deep."

19 AUDIENCE: Deep.

20 ALEX MORTON: Diving deeper. Presenter must
21 be properly edified on Zoom presentations, on three-
22 way calls. I can't tell you back in the day how many
23 three-way calls I was on where the edification was
24 terrible. One of my network marketing mentors, he
25 said your paycheck will be in direct correlation to

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1 your level of edification. One more time, your
2 paycheck will be in direct correlation to your level
3 of edification.

4 I got so good at edifying at my first
5 company, man, I swear I got so good at it. That's
6 probably my number one skill I got good at. That's
7 why I was able to get success in that first company.
8 It wasn't because I was special. I was so good at
9 making other people look so good.

10 How good are you at making other people look
11 good? Well, I don't want to do that. I'm a -- I'm a
12 man. I don't want to make another man look good.
13 Then stay broke, dude. I'm telling you what the deal
14 is, dude. You got to edify other people. You know
15 what a real man does? They're so confident in
16 themselves, they can talk highly about another man,
17 right?

18 Oh, same thing with -- goes with a girl.
19 Well, I don't want to tell her she's pretty because
20 then she's going to be prettier than me. Grow up,
21 man. What are you doing? Well, I can't attract the
22 right -- I can't attract my (inaudible) boyfriend.
23 Yeah, because you're a child. Grow up. You can't get
24 wealthy when you're a little -- when you're acting
25 like a little kid. Grow up, man. Business, personal,

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1 grow up.

2 You want Chairman 750? Guess what? Grow
3 up. Everybody say "grow up."

4 AUDIENCE: Grow up.

5 ALEX MORTON: All right. Damn, they're
6 going, Alex is being hard today. Yep.

7 Okay. Number 2, you must believe 100
8 percent they are going to get started. Again, if you
9 believe they're going to get started, you're going to
10 emit that frequency and energy into them and then,
11 boom, they're going to believe they're going to get
12 started as well.

13 Number 3 is big, too. This is big, man. I
14 talk about having a pleasing personality. Number 3,
15 you have one chance to make a first impression. Eye
16 contact, right? Smile. Everybody smile. Dude,
17 smile. When you smile, it lights up a room. You got
18 to be happy. Most people outside these doors, man,
19 they're pissed. A lot of them think they're depressed
20 or they are depressed. They're mad; they're negative.
21 Everybody's upset. So when you're not those things,
22 people are attracted to you.

23 Wow. People want to be around good people,
24 right? You have one chance at a first impression, a
25 Face -- whether it's a Facetime, whether you're

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1 meeting somebody at the coffee shop, okay, you want to
2 build trust with them. You want to build trust with
3 them. You want to look sharp, right?

4 Number 4, when you're at a physical
5 presentation, obviously, you want to sit next to the
6 people that you bring, you want to be in the
7 presentation. If Jason is doing a presentation in
8 Miami and you're a P5 and he says, everybody, you
9 know, raise your hand if you ever heard about bitcoin,
10 you throw your hand in the air, man.

11 Lean forward -- everybody lean forward on
12 three. One, two, three. Energy is created when you
13 lean forward, when you raise your hand. If you're --
14 if I'm a prospect and I'm sitting in between, you
15 know, Justin and Cash and I'm a prospect and they
16 start raising their hand next to me and saying yes or
17 saying, oh, me, too, me, too. I'm going to naturally
18 be inclined to listen to what the heck the dude in the
19 front of the room is saying. You catch my drift?

20 Number 5, people do not care what you know
21 until they know that you care. Obviously, a lot of us
22 know this, but we need to hear it again and again and
23 again and again. Do you care about people? Do you
24 really care about serving your team or are you just
25 focused on your next rank, next rank, next rank?

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1 People can feel when you're -- what's the word,
2 "ingenuine," "disgenuine," one of those things, right?
3 When you're not -- when you're not a good dude or a
4 good girl, people will catch on to that.

5 Number 6, we talked about it, right? Talk
6 to people about their family, their job, what they do
7 for fun, money, right? Be confident, be active in the
8 presentation.

9 (Music playing.)

10 ALEX MORTON: Thank you for watching this
11 video. For more exclusive content on how to be, do,
12 and have anything you desire, make sure to subscribe
13 to my channel. Click below for the next video.

14 Let's go.

15 (The video recording was concluded.)

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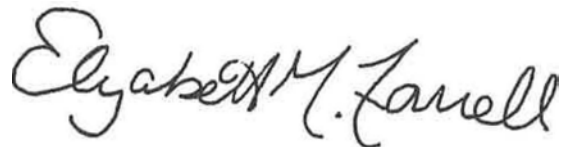
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TRANSCRIBED: AUGUST 29, 2023
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Ivan-Paychecks-FB-Reel-9_29_22

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1 P R O C E E D I N G S

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3 Ivan-Paychecks-FB-Reel-9_29_22

4 IVAN: You're all going to make money, I
5 know this. It's just a matter of time. Once you get
6 this money, once you get this paper, invest it into
7 assets. Look, I'm not a financial advisor, but I'm
8 going to tell you what's worked for me. Assets,
9 cryptocurrency, real estate, anything else that you
10 like and consider to be a growing asset. Don't spend
11 it on stupidity, because you never know when it's
12 going to rain.

13 So as soon as you start getting that money,
14 invest it into assets immediately.

15 (The video recording was concluded.)

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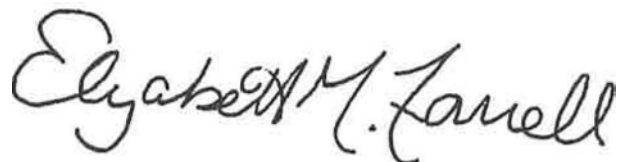
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1 P R O C E E D I N G S
2 - - - - -
3 IM-mastery-academy-YT-10_8_22-wrm
4 (Music playing.)
5 UNKNOWN FEMALE: Amazing day, everybody.
6 (Music playing.)
7 UNKNOWN MALE: Chairman 25 signified a
8 different level of freedom. It signified the ability
9 to really be able to take care of my family unlike
10 I've never been able to before.
11 (Music playing.)
12 UNKNOWN MALE: We had to realize that it
13 wasn't what happens to you in life, but it's what
14 happens for you in life.
15 (Music playing.)
16 UNKNOWN FEMALE: You probably all think that
17 Chris and I are your hero, but I'm here to tell you
18 that you are my hero.
19 UNKNOWN MALE: And I'm grateful and I thank
20 you guys for trusting our vision and trusting our
21 mission and I promise you the best is yet to come,
22 guys.
23 (Music playing.)
24 UNKNOWN MALE: You are a (inaudible). Swing
25 with me.

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IM-mastery-academy-YT-10_8_22-wrm

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10/8/2022

1 (Music playing.)

2 UNKNOWN FEMALE: To become the person you
3 want to be, never ever, ever let anybody tell you what
4 you can and what you cannot do it.

5 (Music playing.)

6 UNKNOWN MALE: The next time you de-rank,
7 I'm not ready to give up this ship. The next time
8 somebody quits my business, I'm not ready to give up
9 this ship.

10 (Music playing.)

11 ALEX MORTON: Go crazy, go nuts, and make
12 some noise for Christopher and Isis Terry.

13 (Music playing.)

14 UNKNOWN MALE: You forgive yourself, you
15 apologize to the universe and you step forward for
16 success.

17 (Music playing.)

18 UNKNOWN FEMALE: You are part of IM Academy
19 and, more importantly, IM Academy is part of you.

20 (Music playing.)

21 UNKNOWN FEMALE: The powerful ladies, watch
22 out, because we're coming.

23 (Music playing.)

24 (The video recording was concluded.)

25

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IM-mastery-academy-YT-10_8_22-wrm

IM Mastery

10/8/2022

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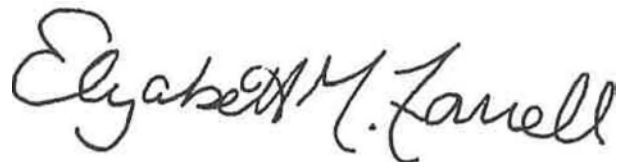
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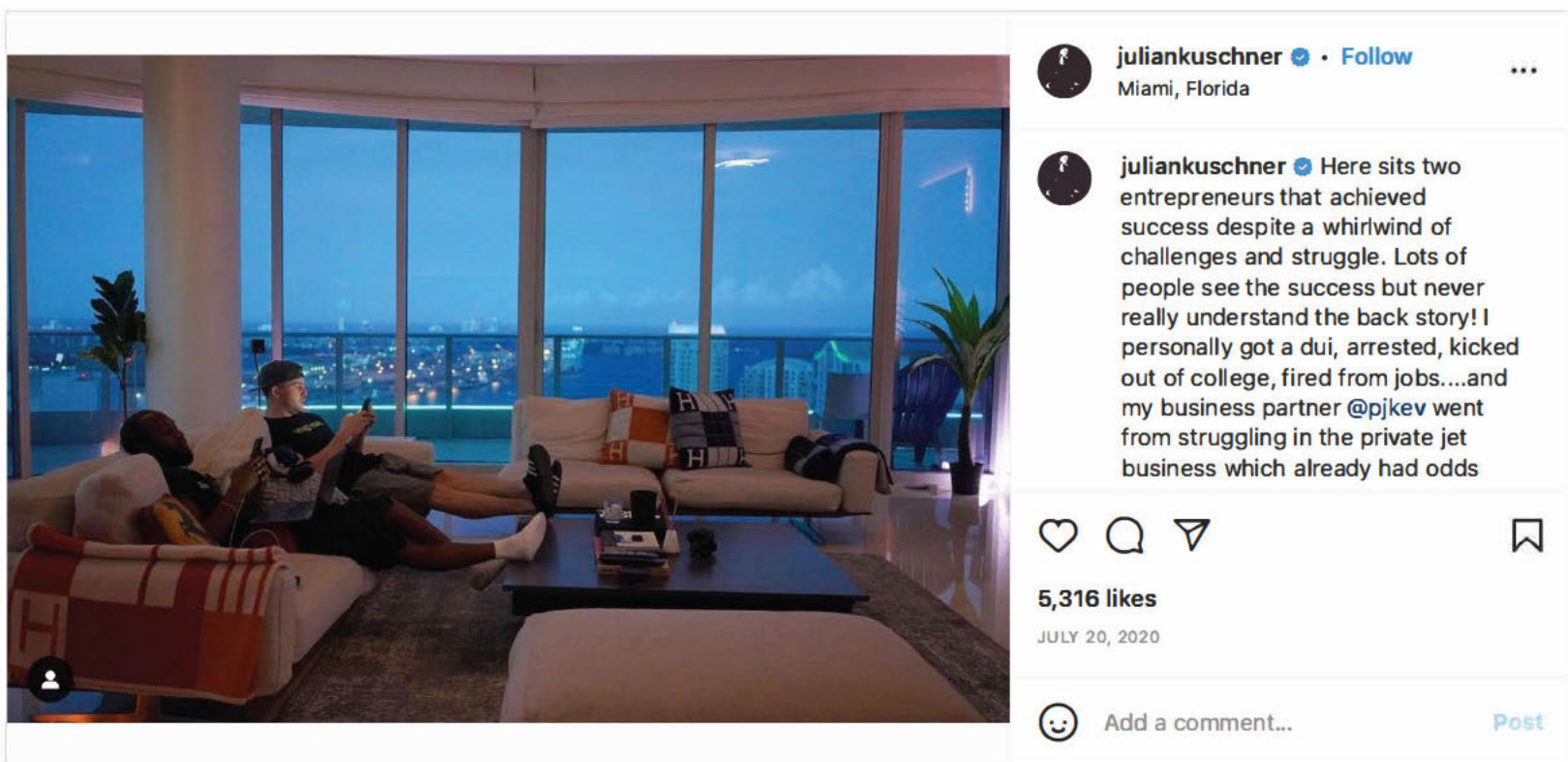
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Miami, Florida

clients and making calls... now he is booking jets daily for celebs and entrepreneurs around the world. When I lost a \$50k/month income overnight due to business issues.... I did not give up...i got back to building business! I don't care where you come from, your background, what you have been through. Most of the time people use that as an excuse anyways....Consistency and hard work really does pay off if you



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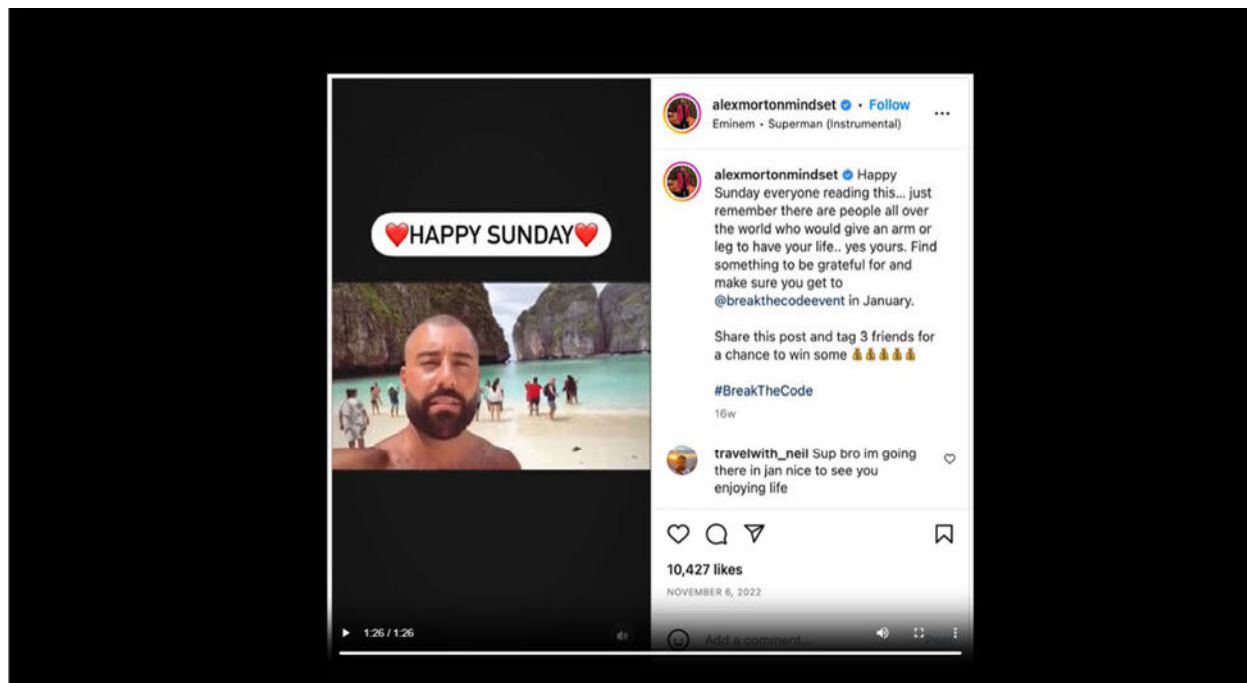
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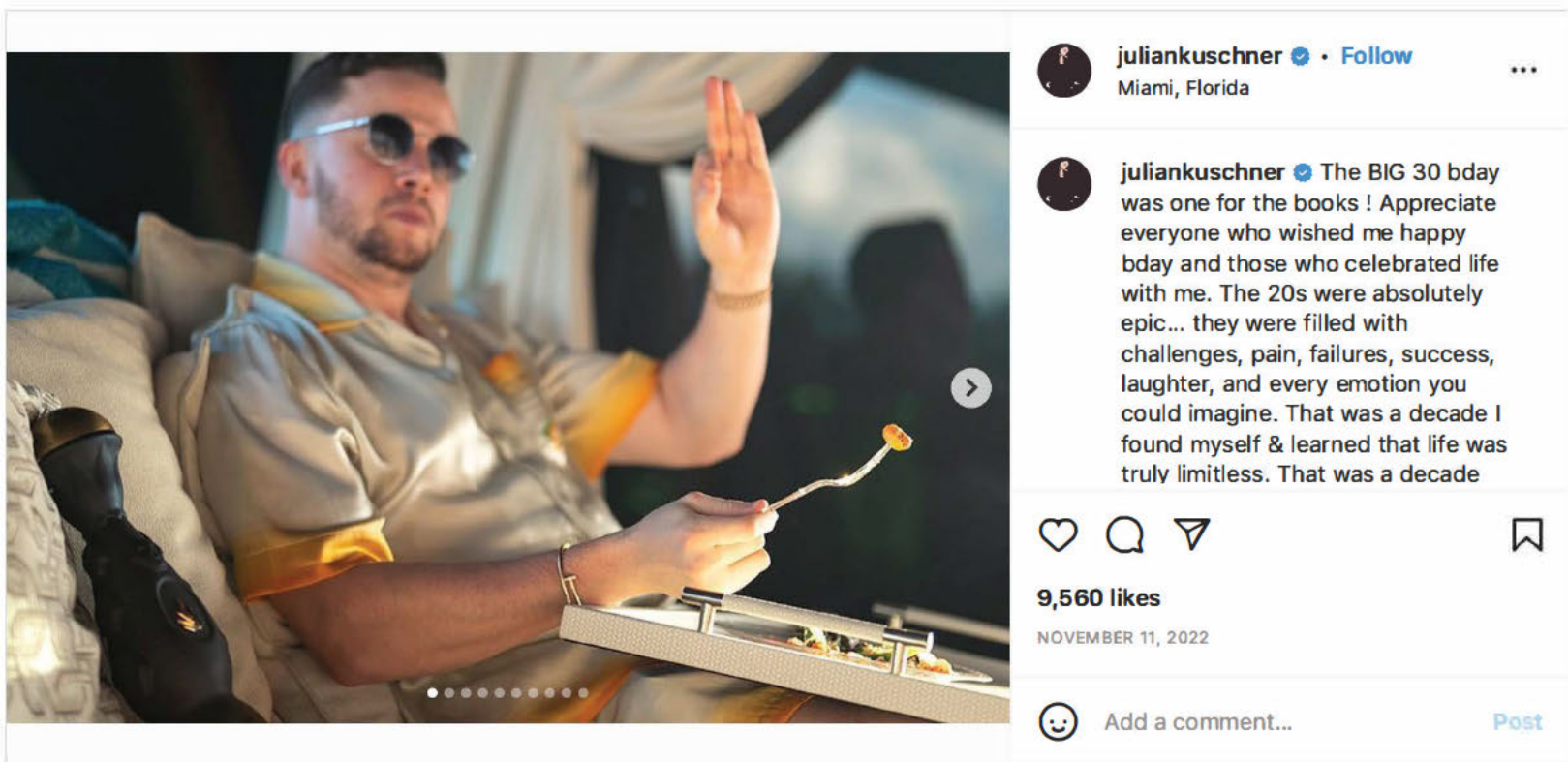
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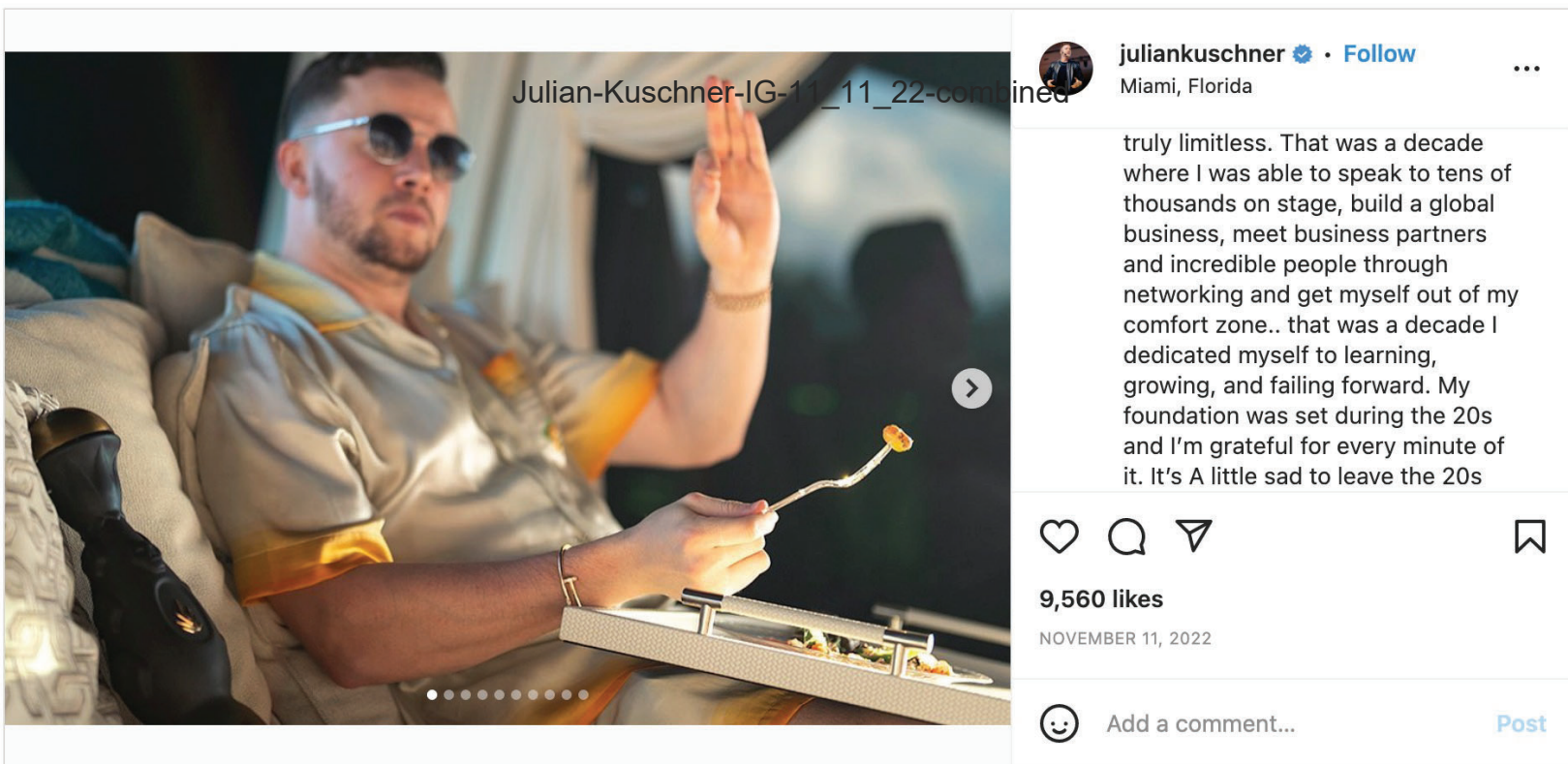
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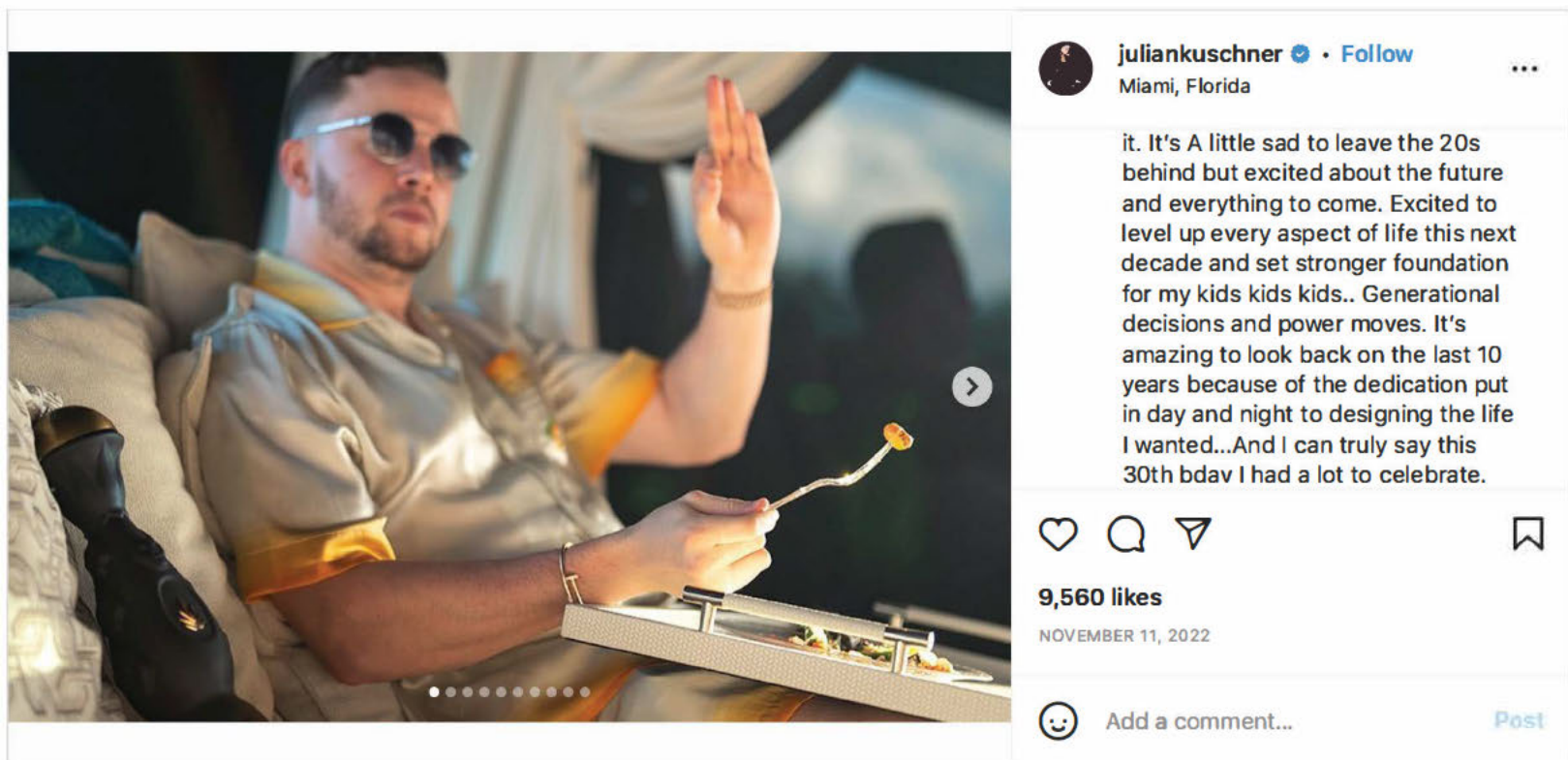
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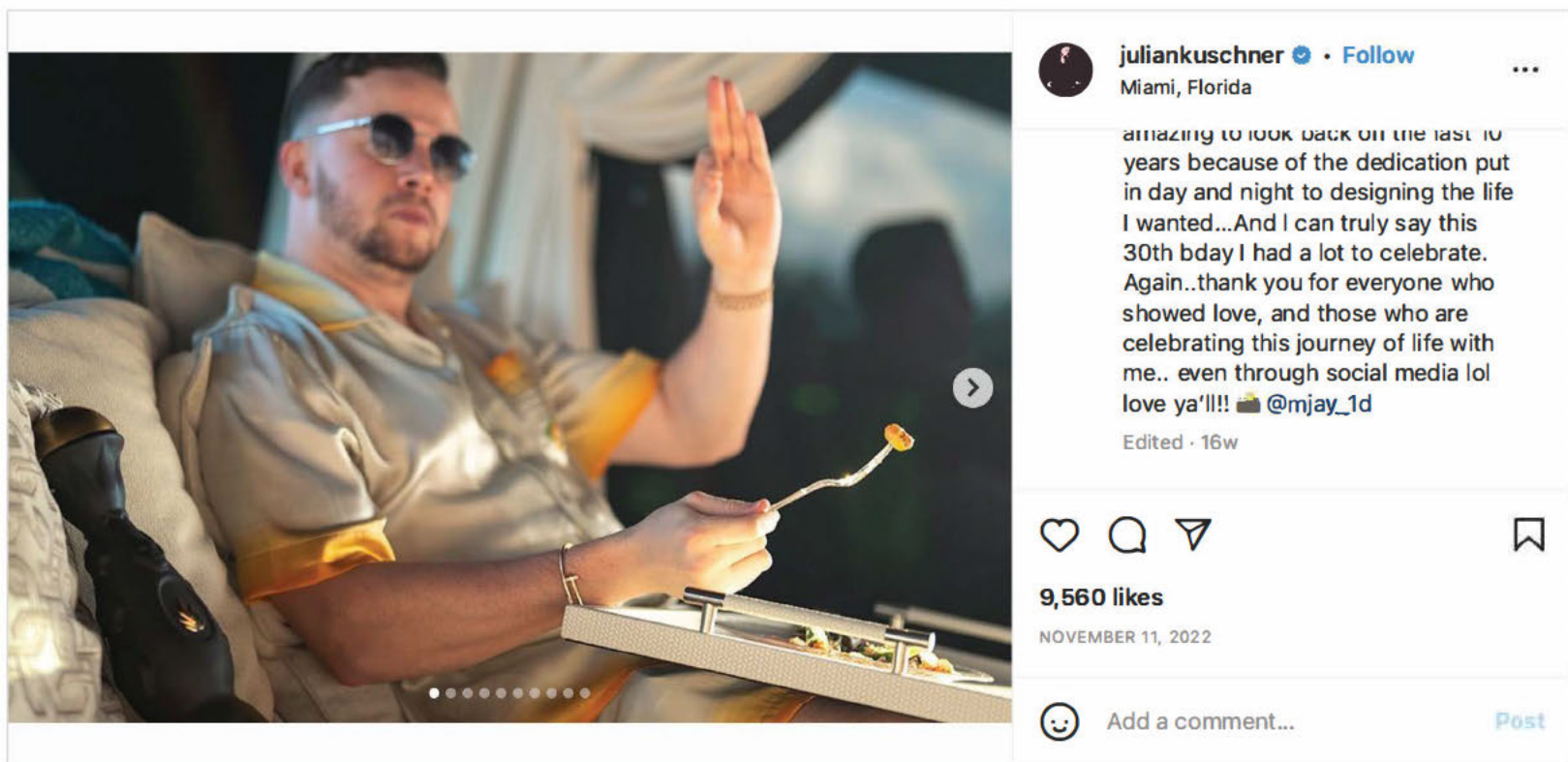
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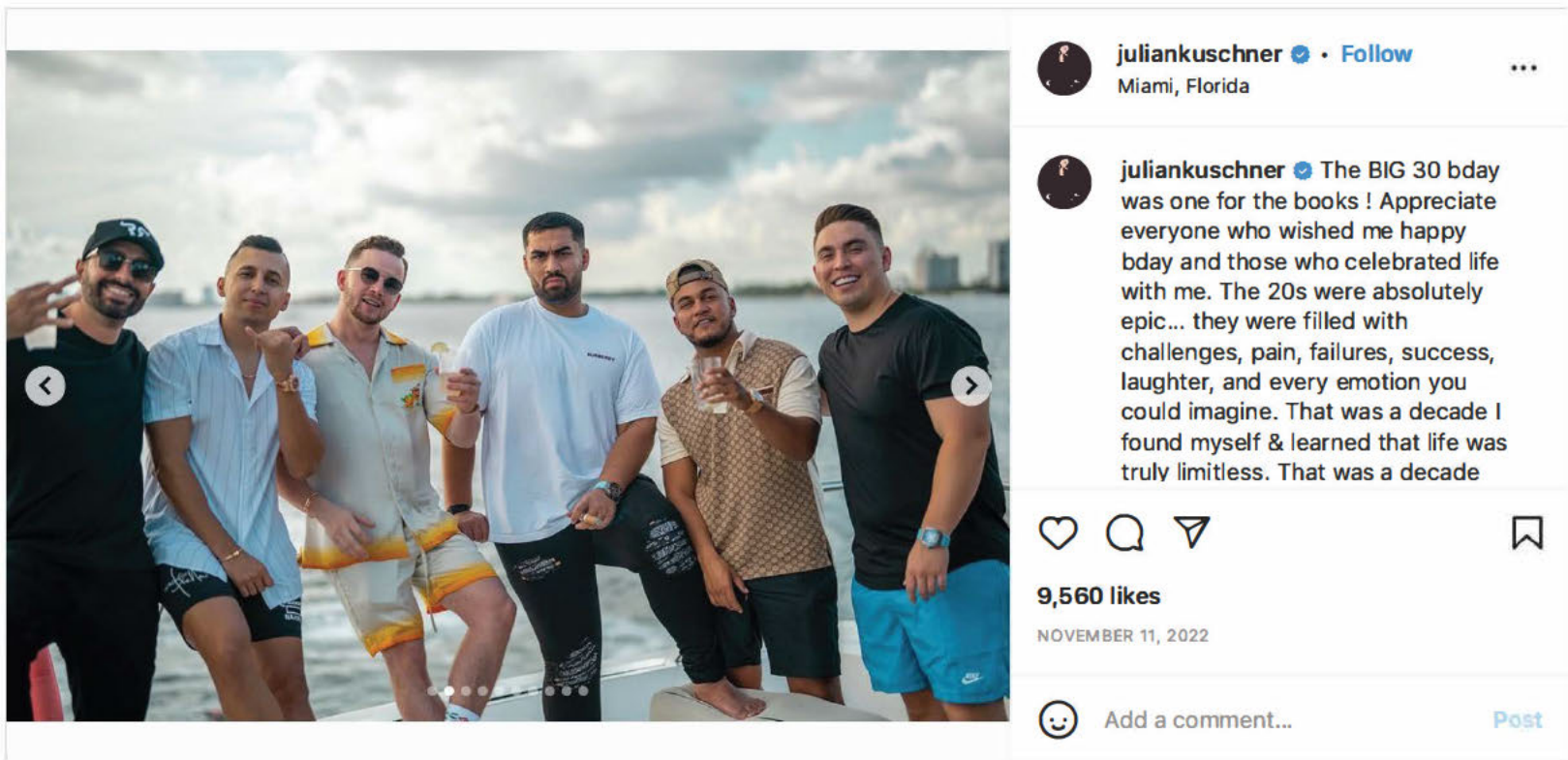
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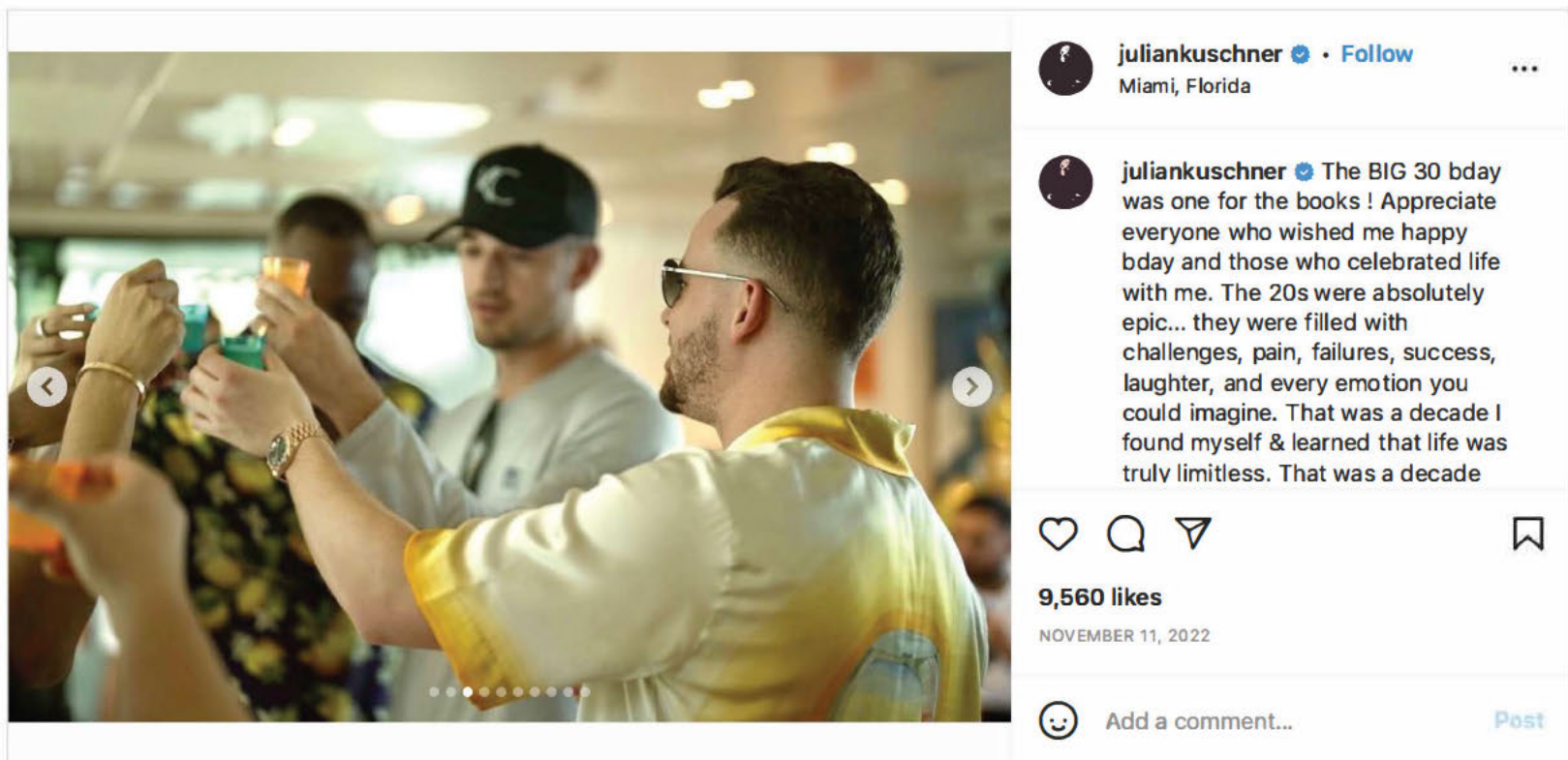
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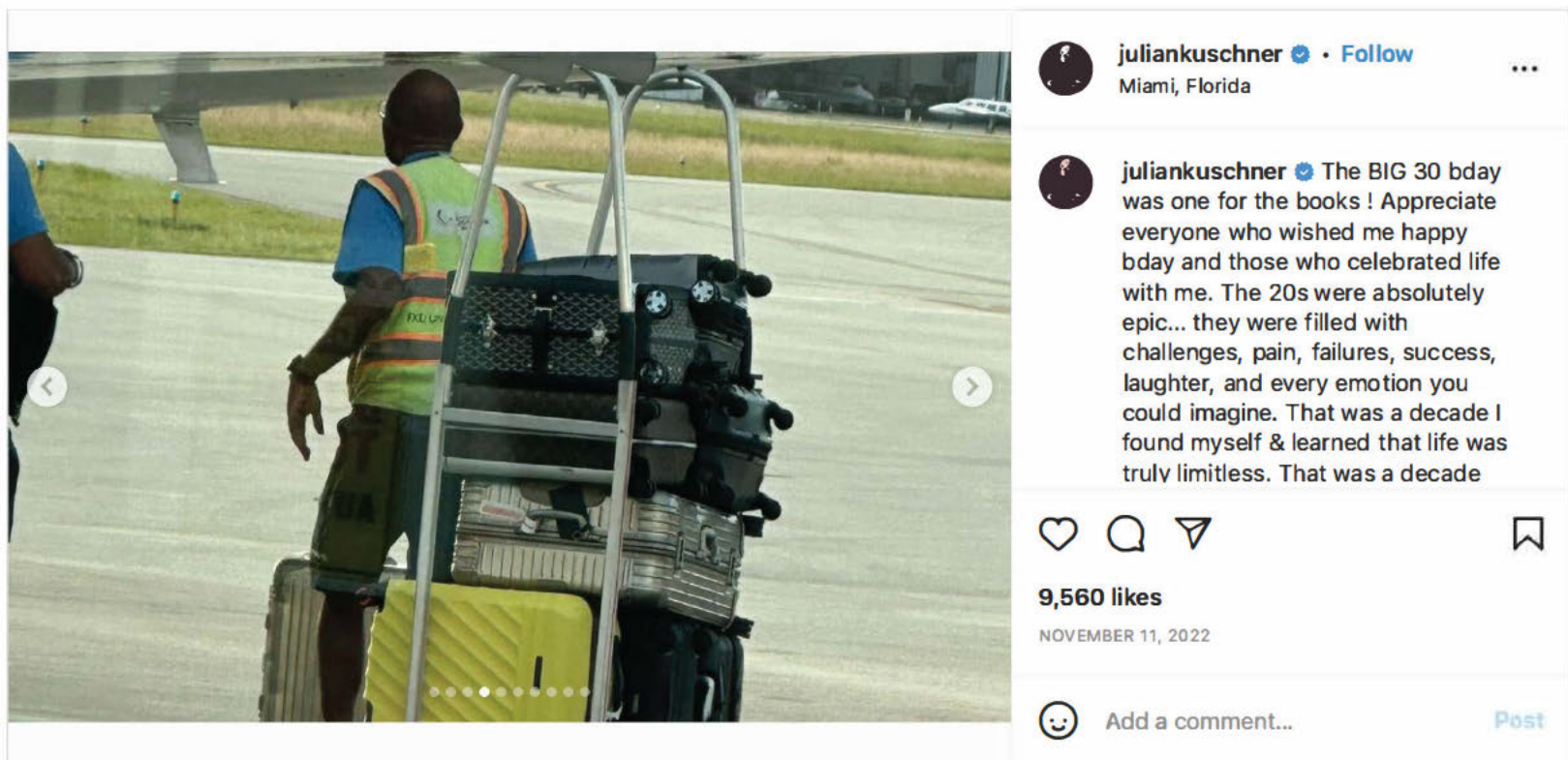
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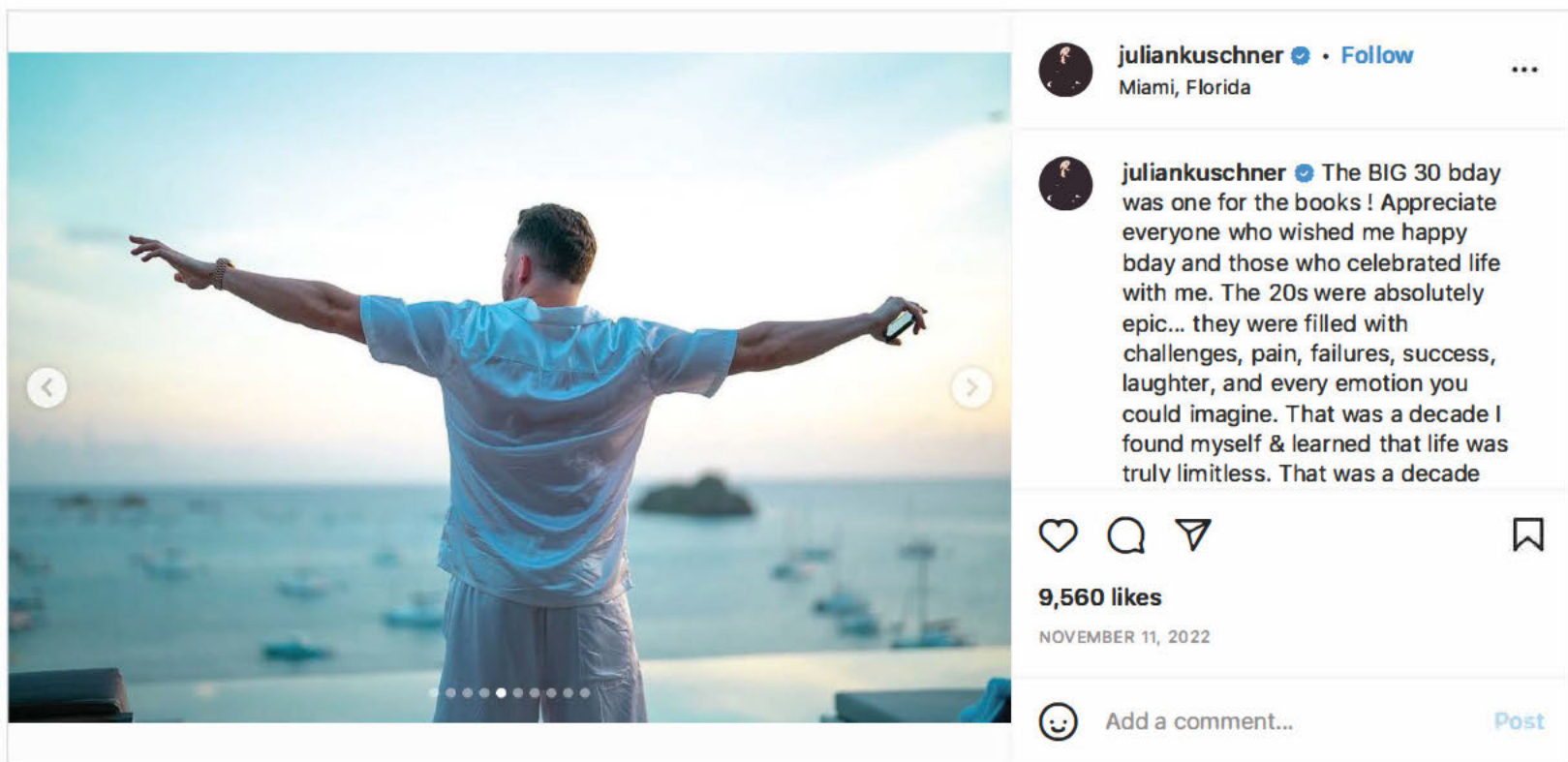
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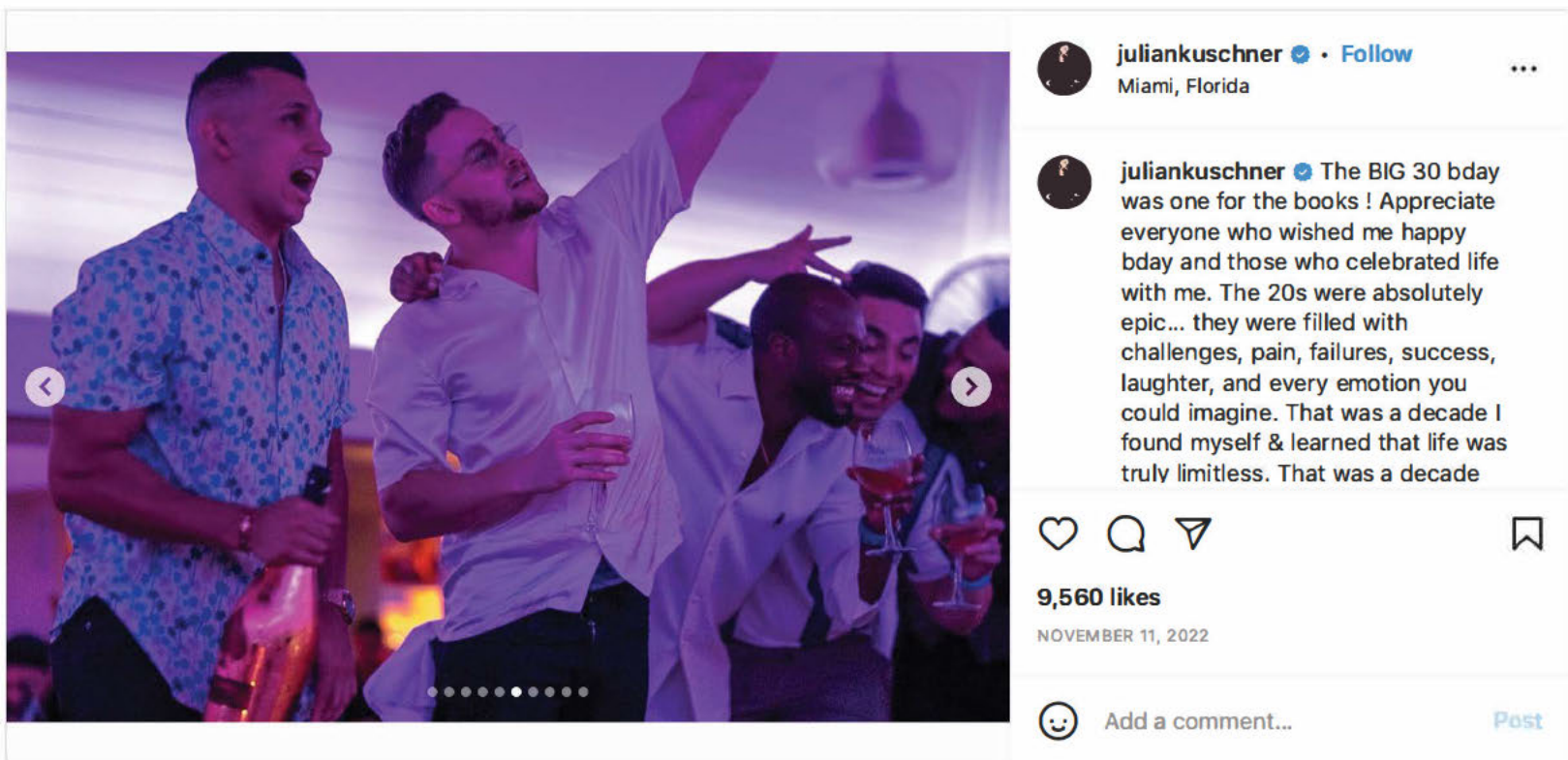
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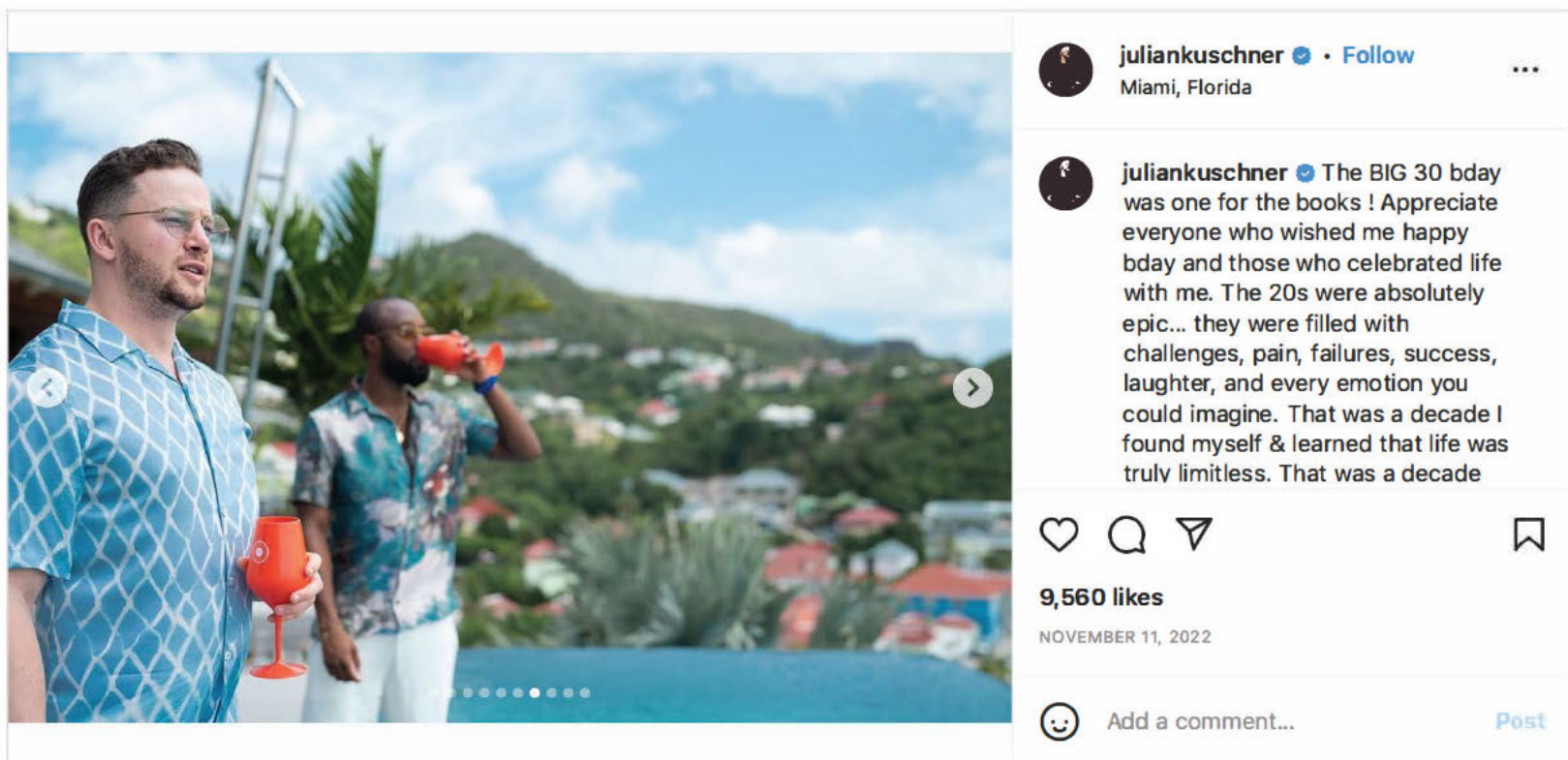
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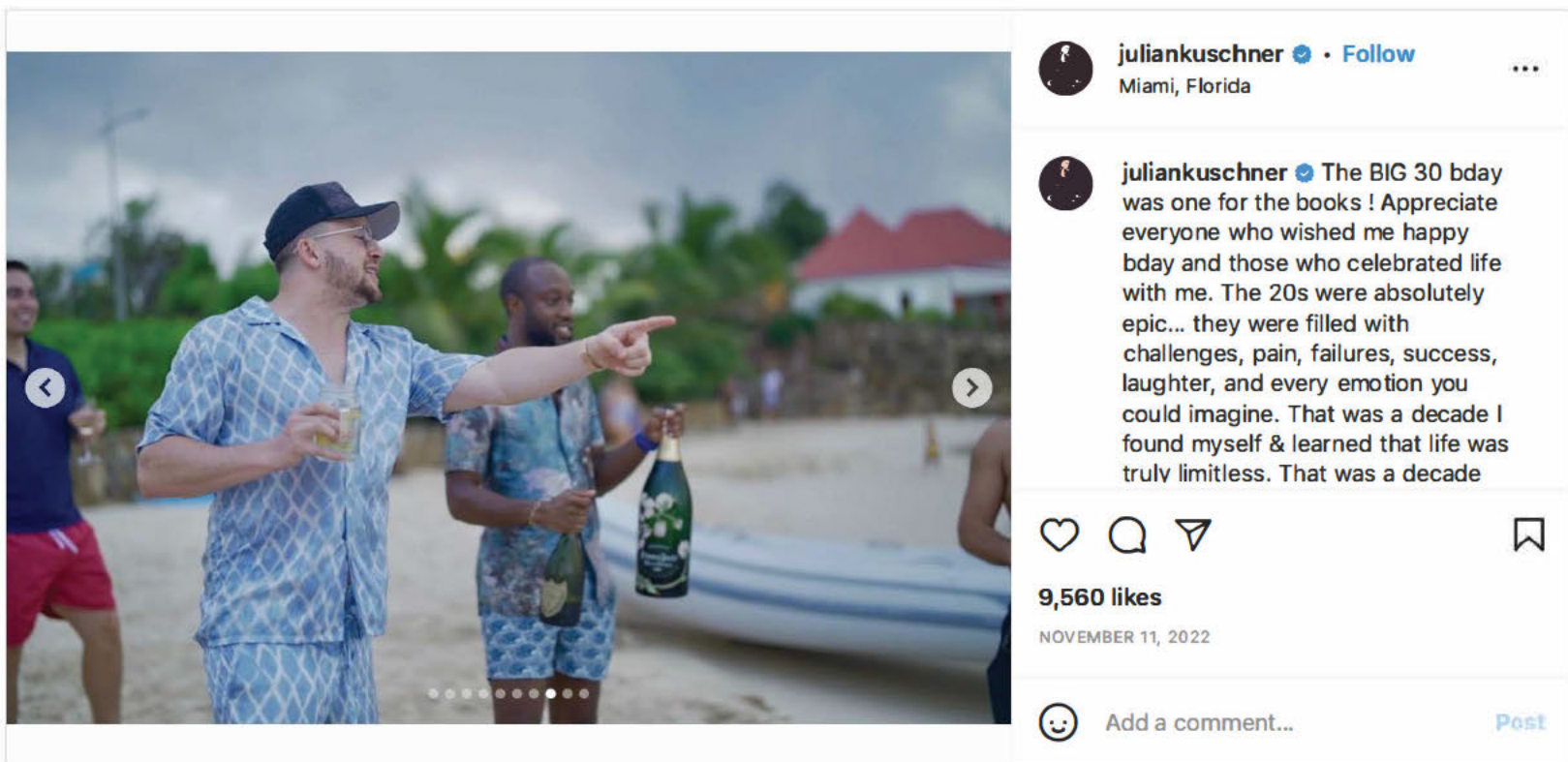
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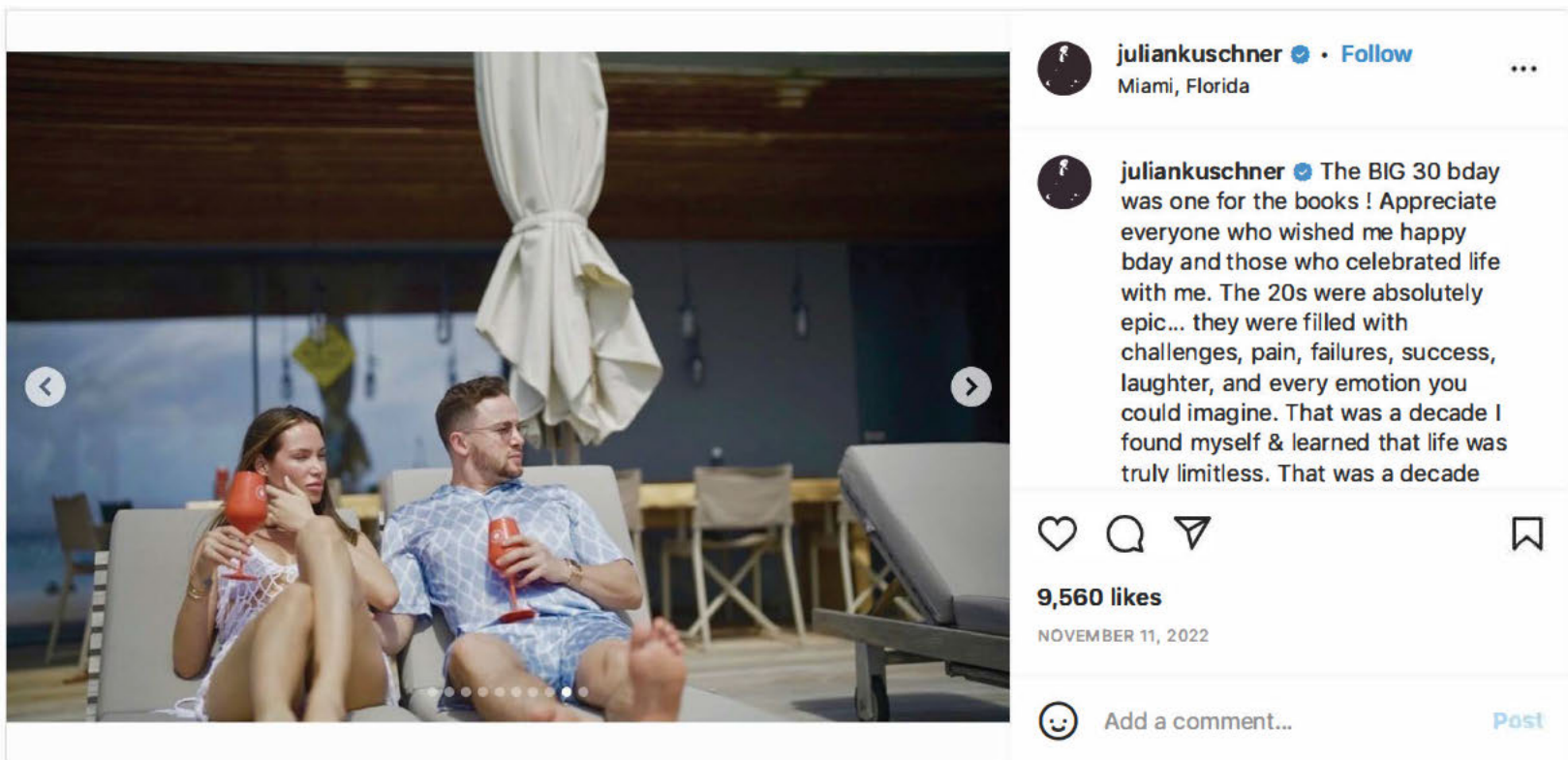
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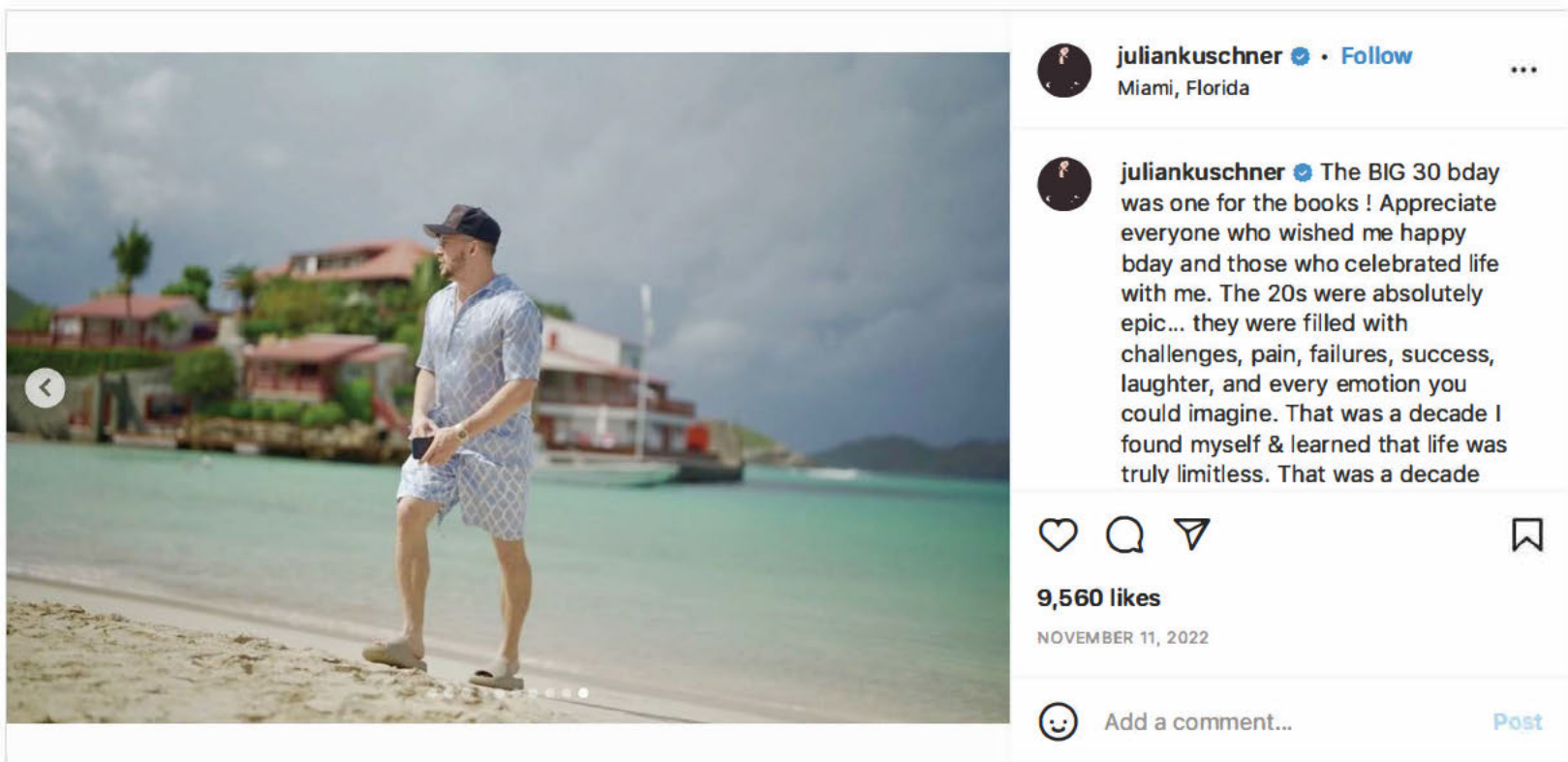
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What's your Side Hustle??



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Deondrae-C-IG-12_4_22-combined



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 drae_carter Good morning y'all 🌞

I don't even recognize myself...

Getting up at 5am? A day trader??

I honestly didn't think 🤔 I was smart enough.

I thought you had to be some kind of genius to be successful with it.

But here I am... up before the sun and taking my own trades.



Why?

Because I'm HUNGRY FOR BIG CHANGE!!



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CHANGE!!

As much as I love our business and nwm... I love trading even more! ❤️

With trading... I rely on only myself and I don't have to worry

If I don't wake up and get in the markets... that's on me!

There's no product to sell... no team to manage... and I get to choose when I want to trade.

And compounding your money is where it's at \$

My goal is to increase my trading account by 3% every day...



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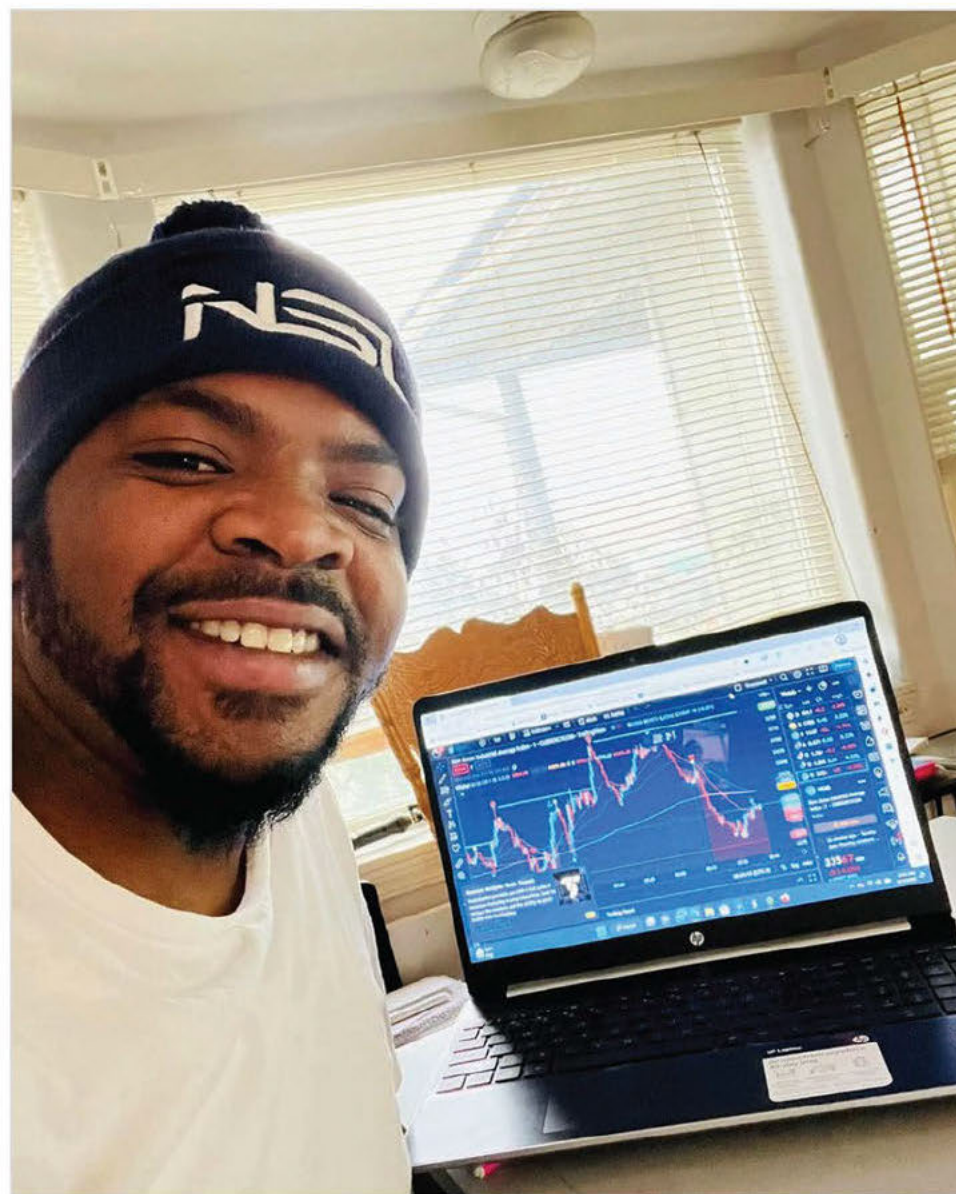
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account by 3% every day...
yesterday I increased it by 5.5% 🏆

You can turn a \$1000 trading
account into hundreds of thousands
of dollars in a short amount of time if
you are consistent, disciplined and
take time to master the skill.

So... getting up at 5am isn't so bad
when you have BIG GOALS!!! 🏆

And as it turns out... you don't need
to be a genius to learn how to trade.
You just have to learn to have
DISCIPLINE!!

Message me the word "INFO" for
more information!

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when you have BIG GOALS!!! 🏆

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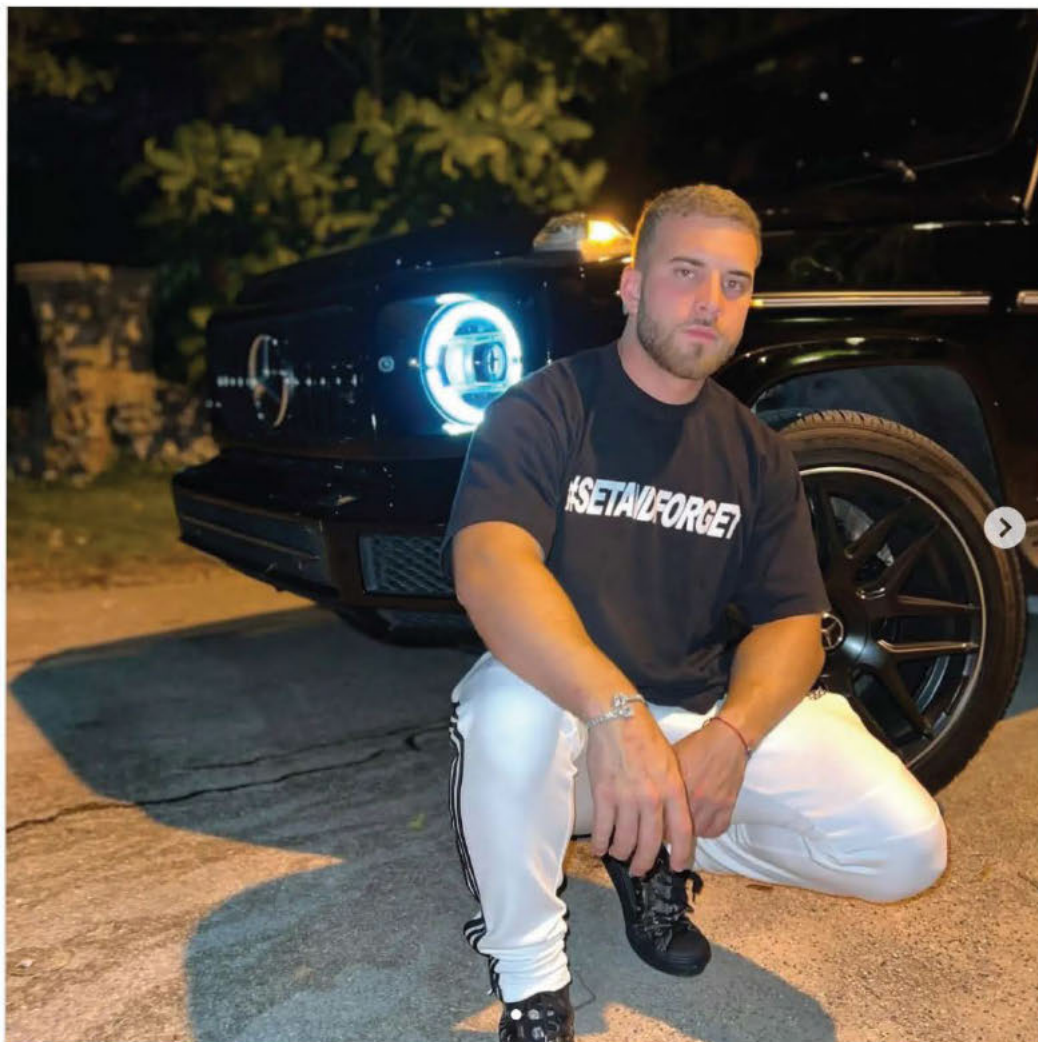
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Hutchinson-F-IG-2_13_23-A-combined



Hutchinson-F-IG-2_13_23-A-combined



trade_with_hutchinson_fernando ...



trade_with_hutchinson_fernando
Time to exercise the "I don't give a fu*k muscle" 🔥!!

I've learnt the more you don't actually give a damn what people think of you or the need to be "liked" is reduced...the further you get in life.

That doesn't mean that you, yourself change...it's literally you give yourself permission to be the REAL unfiltered version of you, which is most powerful and where you can create the biggest change in life!

History wasn't created by people who worried what you thought about them so why do you?



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FEBRUARY 13



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who worried what you thought about them...so why do you?

I make you harness this approach to full effect through my PRIVATE ACCOUNT MANAGEMENT/MENTORSHIP 📩 learn more about it here 📩 click the link in the BIO 🔥🔥!!

•
•
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Nevertheless private account management is still going on. DM for More info;



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management is still going on.
DM for More info;

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alyssastivers_ Aw omg you guys are so cute 🥰



4w Reply



yolandaotero1325 Waaaa you're looking 🥰🥰 love you yall blessings



4w Reply



jessewiththebeard 🥰🔥🔥🔥 too dope, enjoy!!!



4w Reply



5,894 likes

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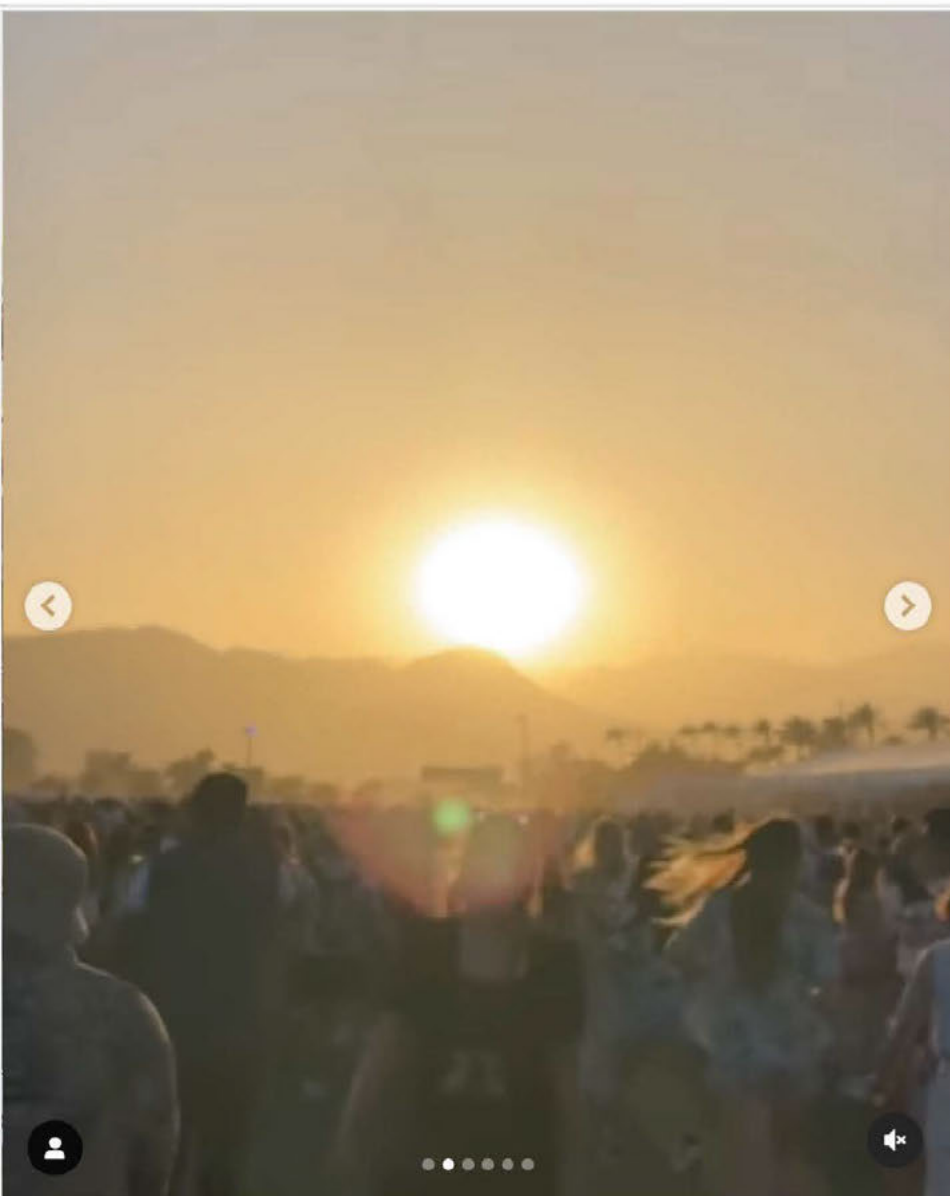
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4w



alyssastivers_  Aw omg you guys are so cute 🥰



4w Reply



yolandaotero1325 Waaaa you're looking 🥰🥰 love you yall blessings



4w Reply



jessewiththebeard 🔥🔥🔥 too dope, enjoy!!!



4w Reply



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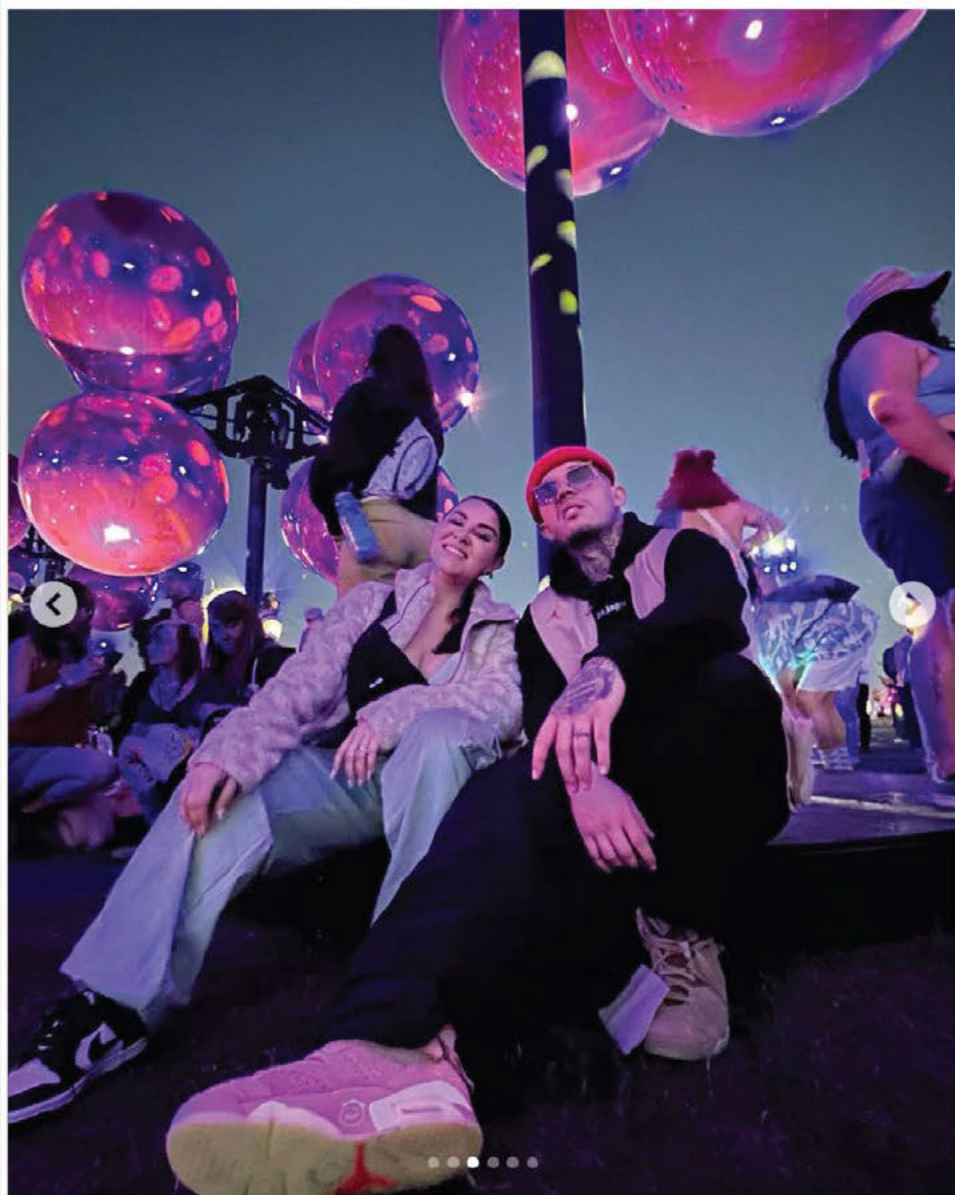
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4w



alyssastivers_ Aw omg you
guys are so cute 🥰



4w Reply



yolandaotero1325 Waaaa you're
looking 🥰🥰 love you yall
blessings



4w Reply



jessewiththebeard 100🔥🔥🔥 too
dope, enjoy!!!



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4w Reply



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4w Reply



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4w Reply



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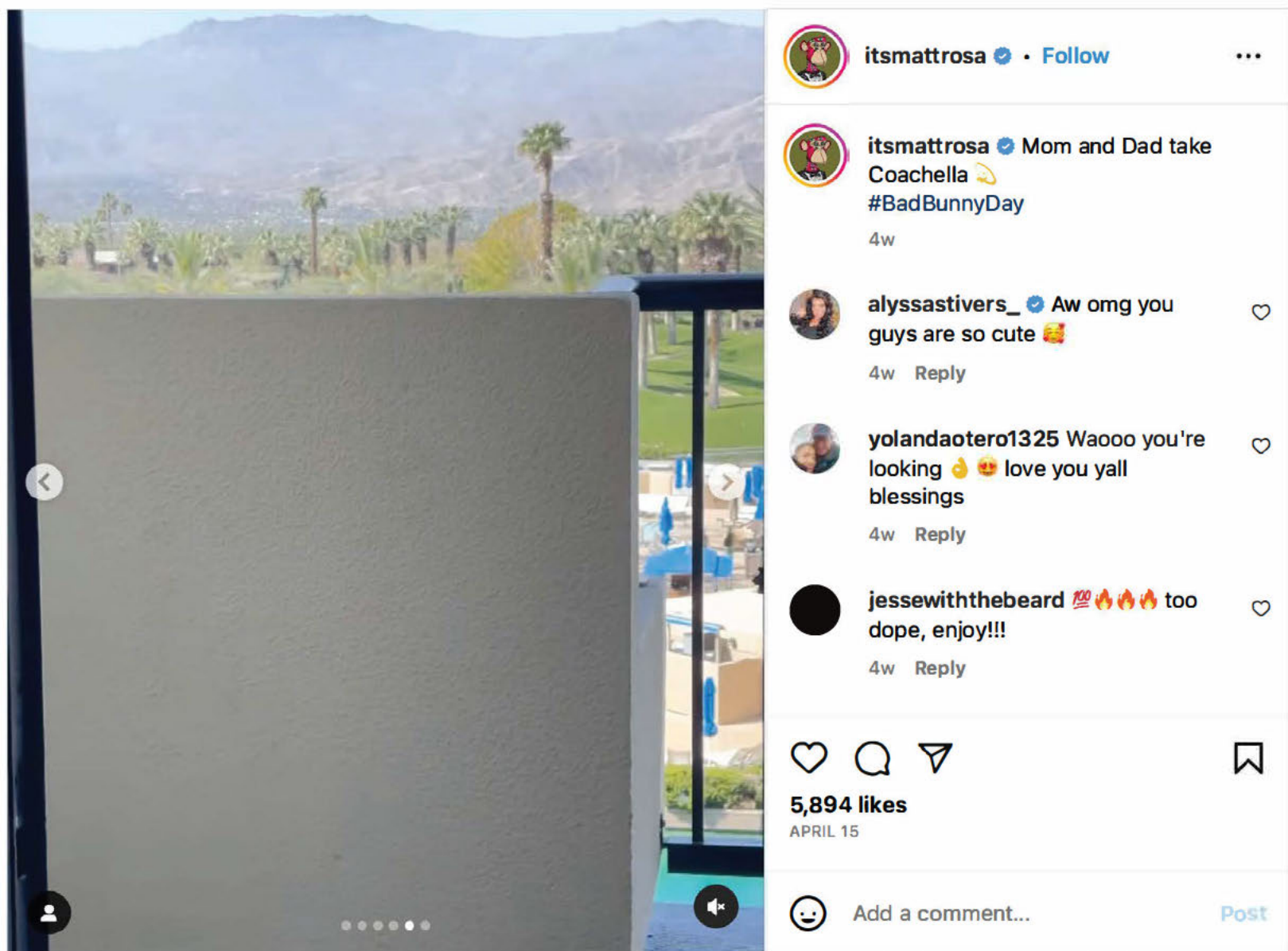
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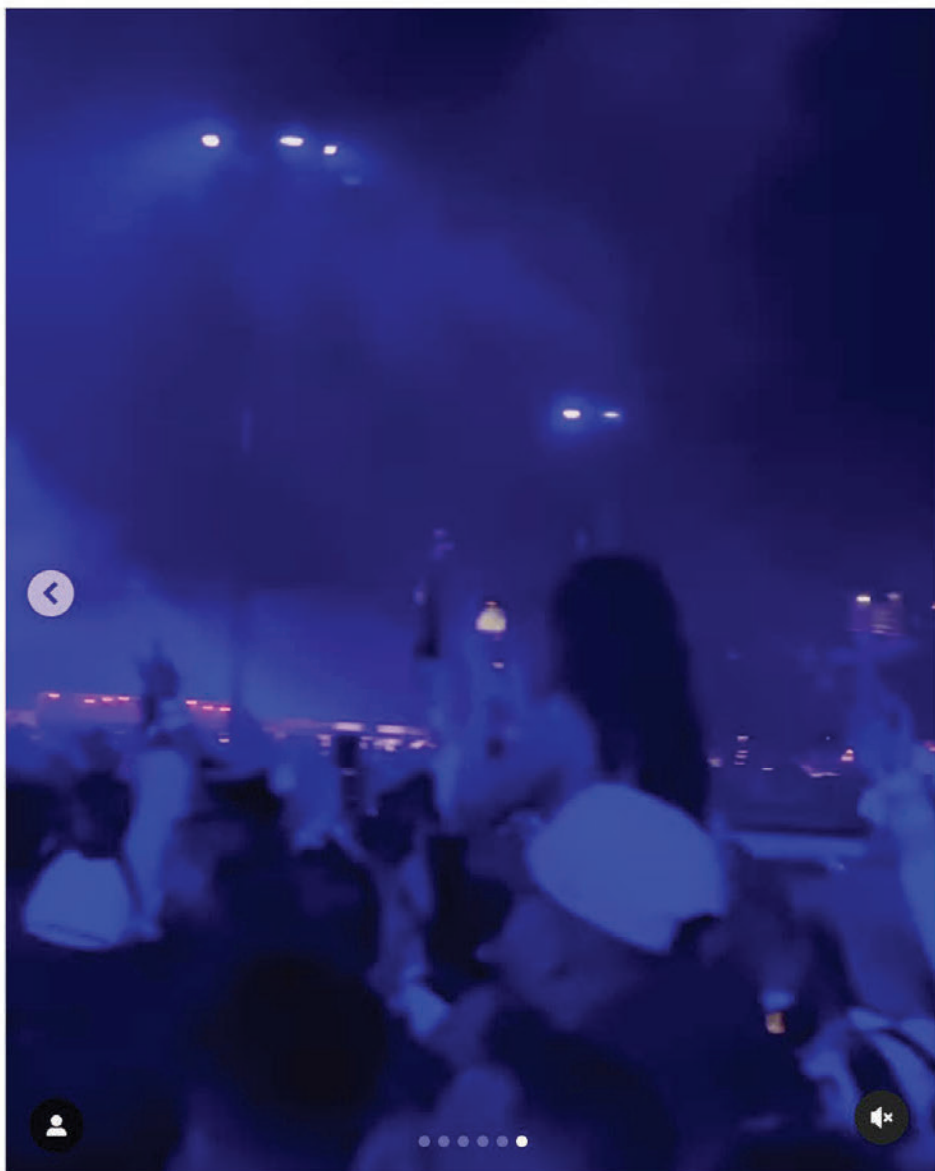
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4w Reply



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jessewiththebeard 100🔥🔥🔥 too dope, enjoy!!!

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economy and world will require all of us to think, feel, & act differently in order to thrive.. and for some merely to survive and take care of our families. The writing is on the wall.. nobody's job is safe, 401K and social security is a joke, & it's evident we must all take full responsibility for our lives. Residual income is one of the most beautiful concepts on the planet. Do something ONCE and get paid over and over and over and over again. I'm at Coachella with my wife and close friends and the check that hit on Friday.. some of that was from work I did in 2016 and tbh a small amount was from work I did in 2012.. work hard yes, but also work smart. Trading time for money will ensure you never move your financial family tree forward. Blessings ❤️

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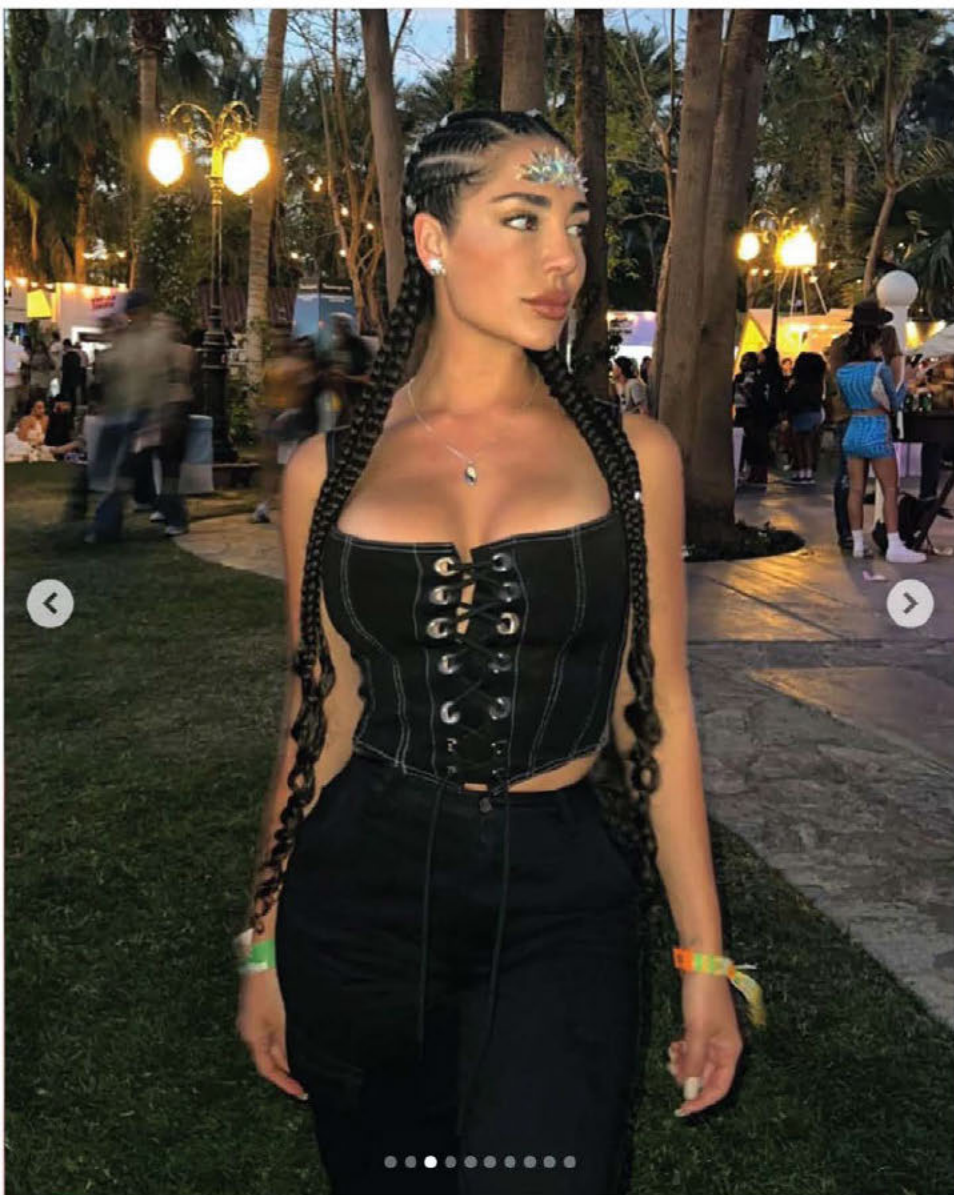
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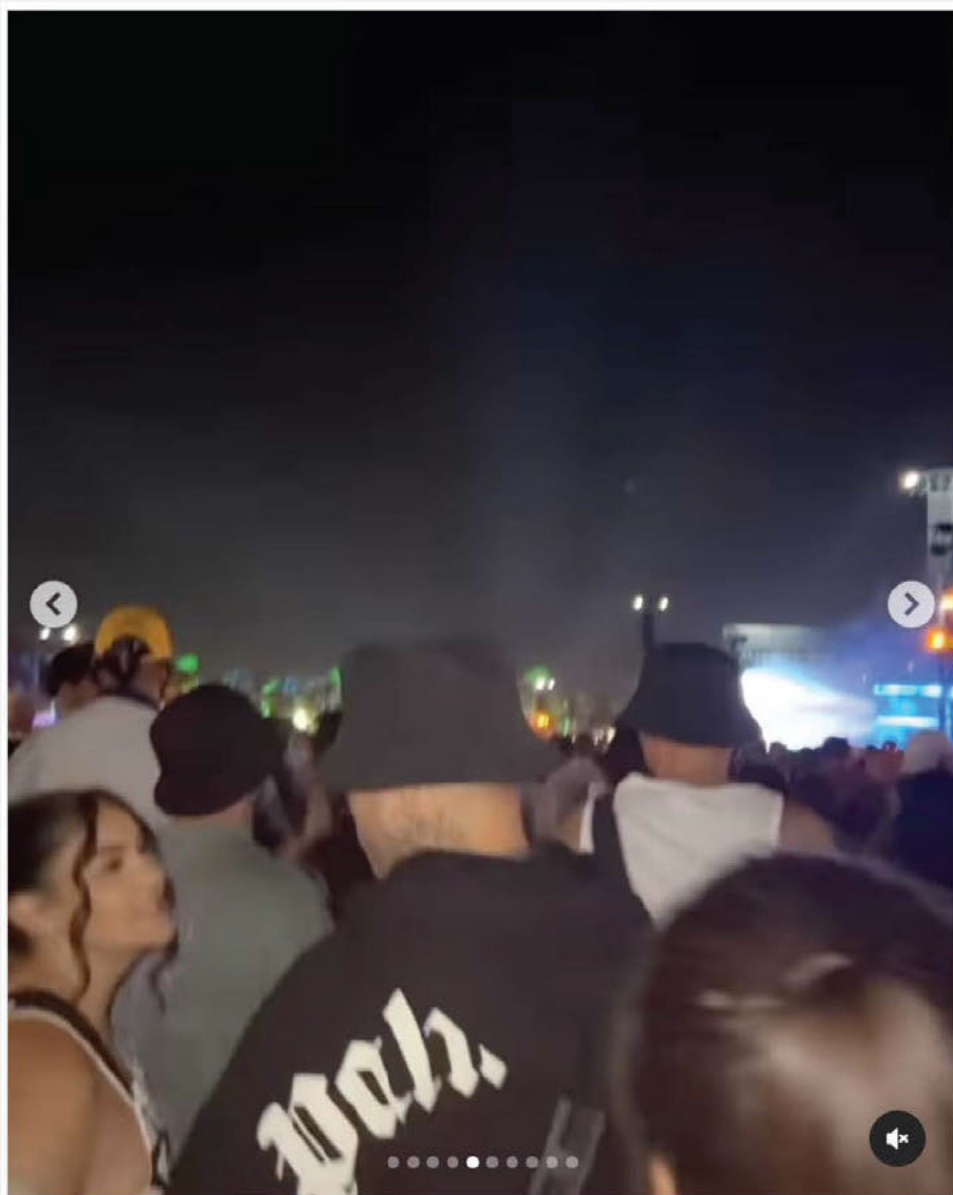
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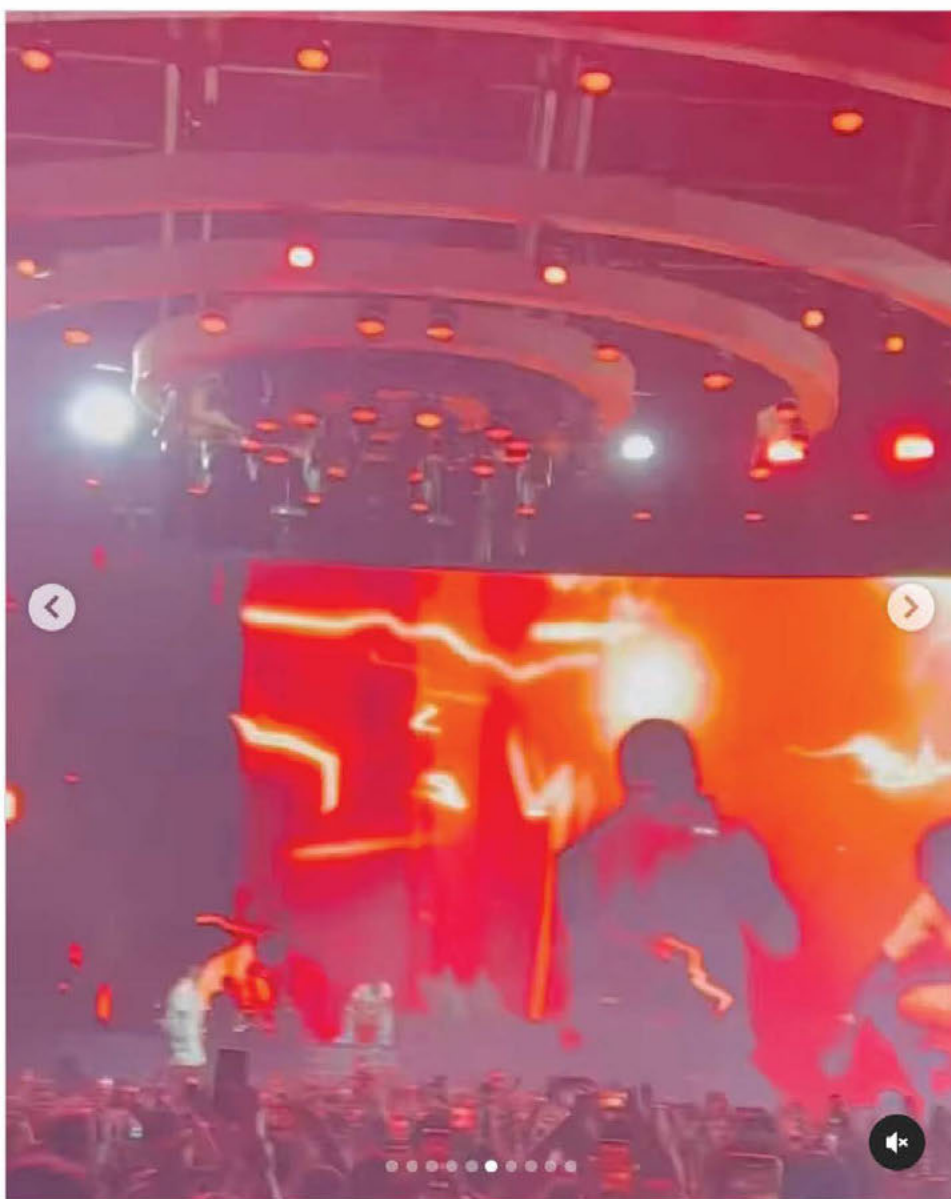
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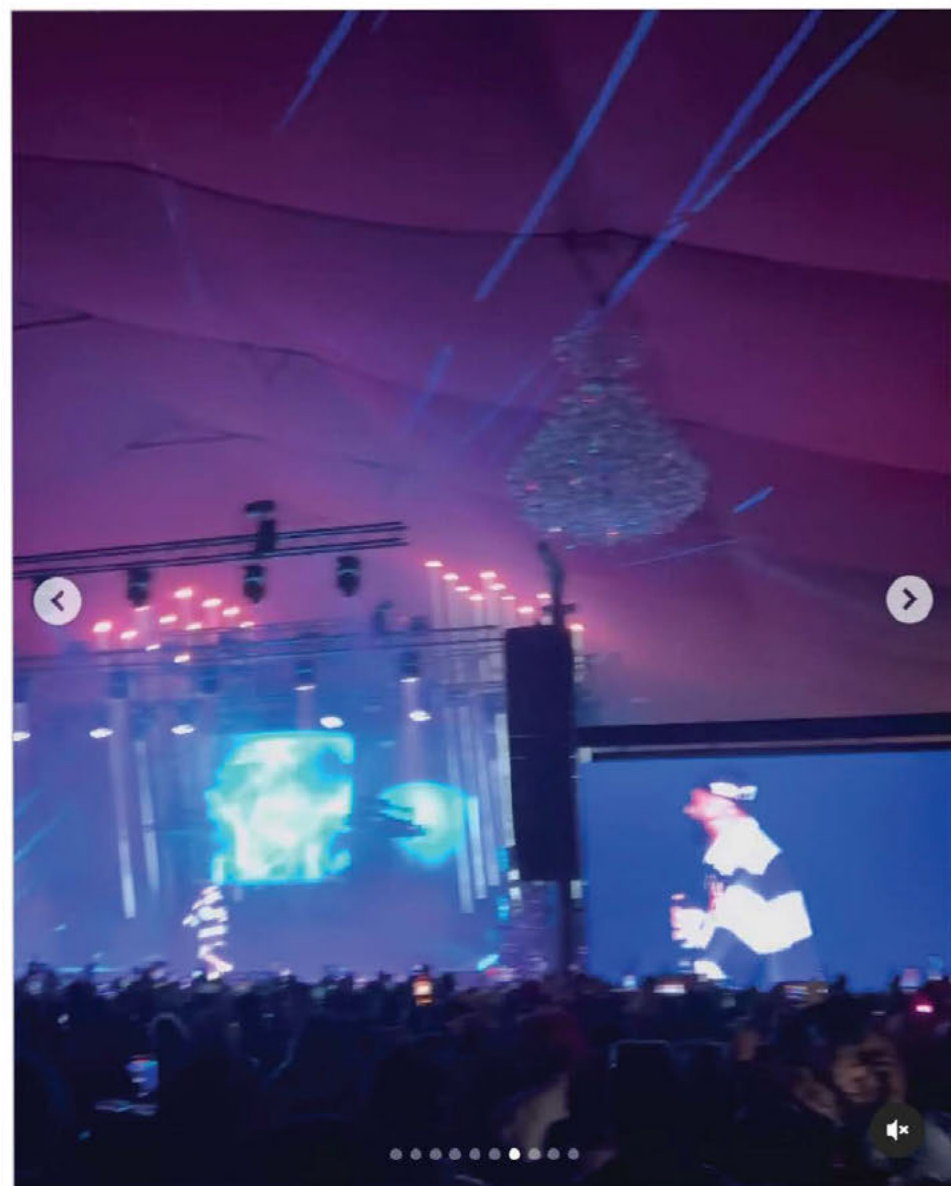
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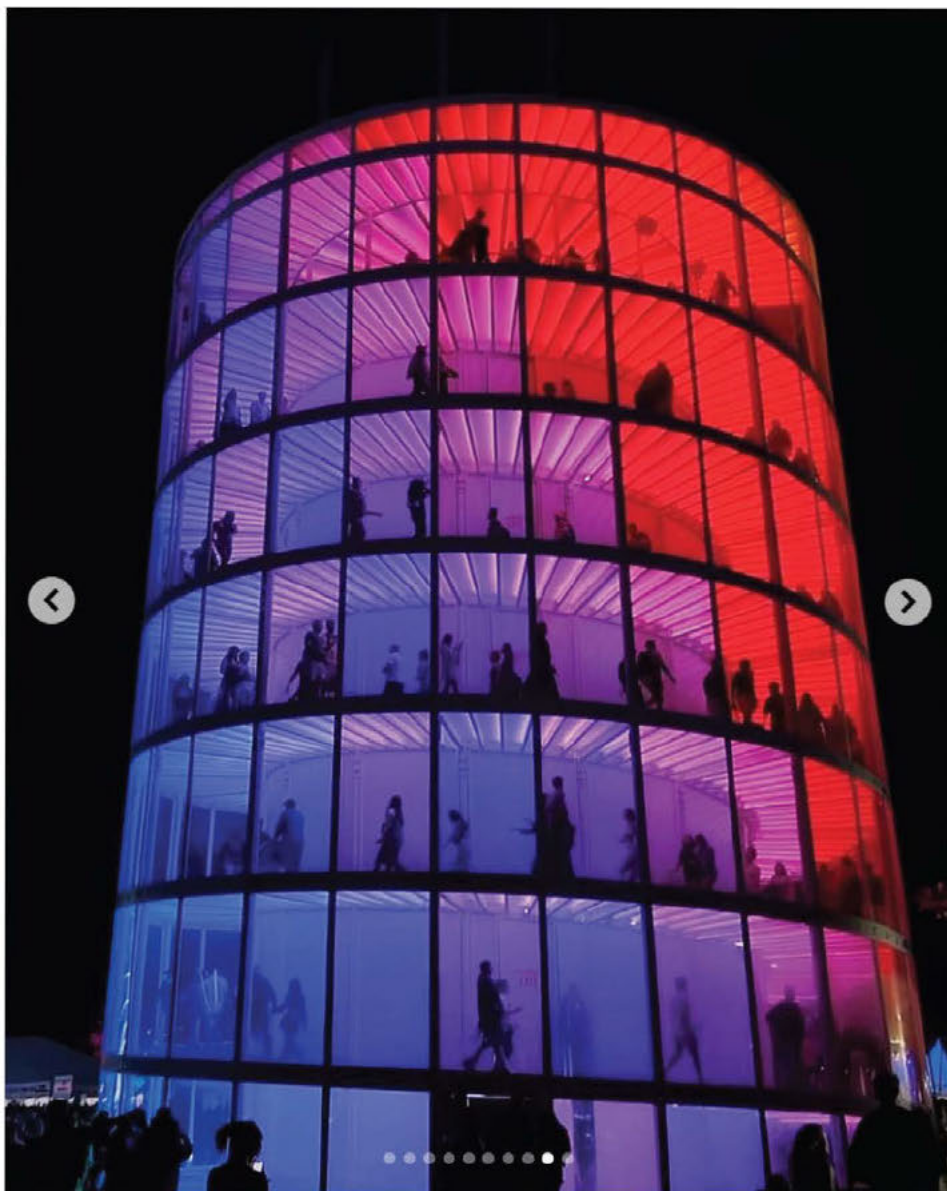
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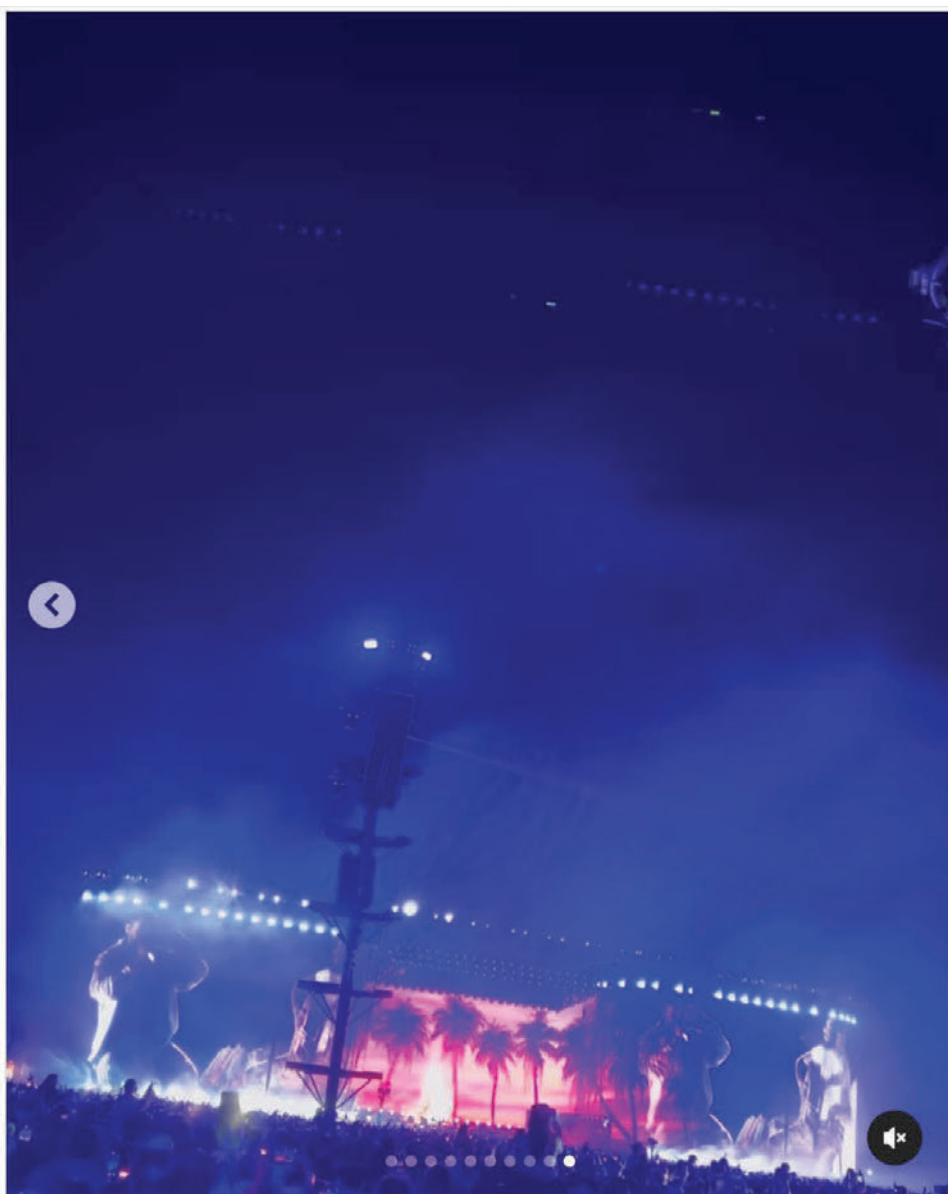
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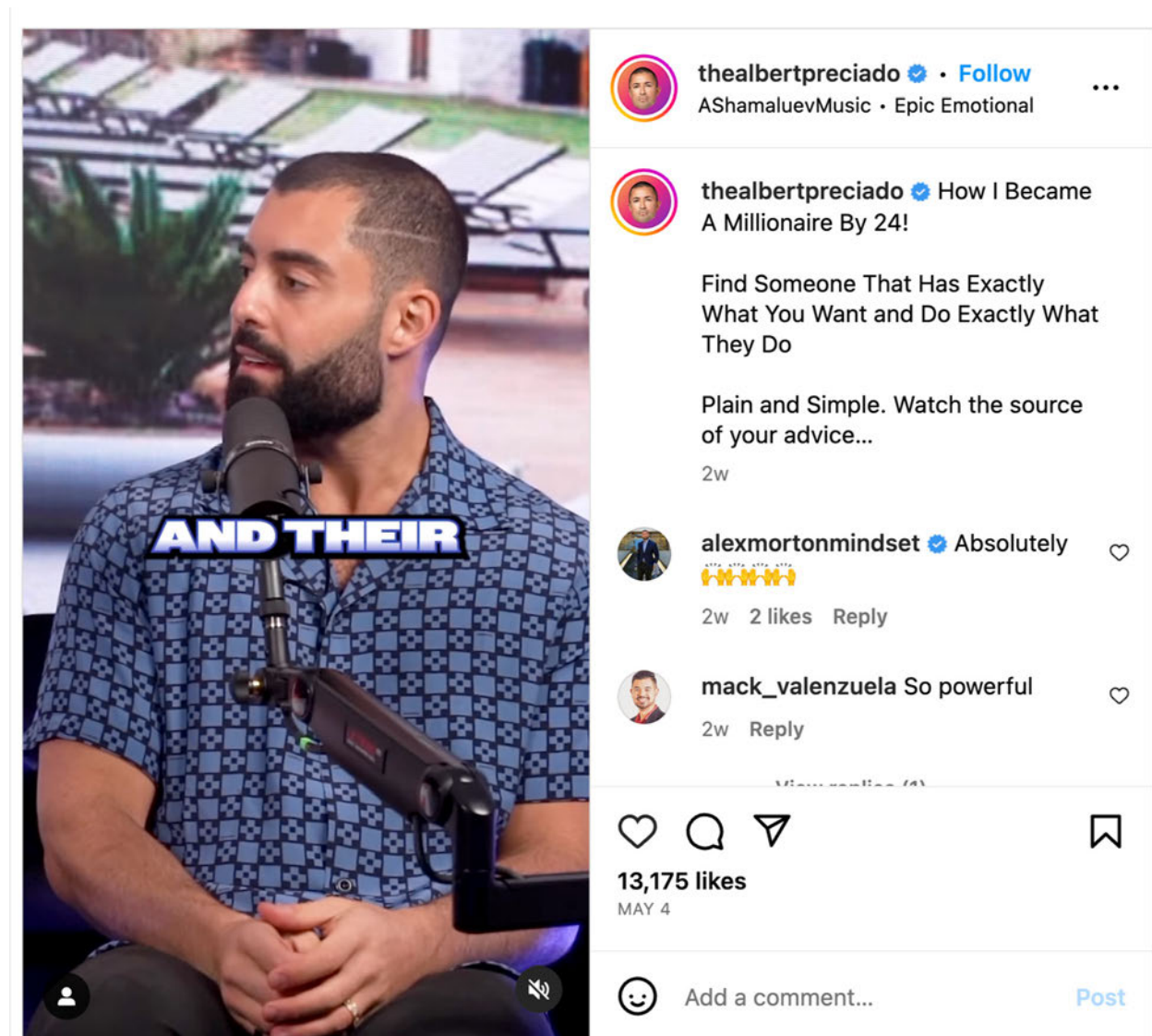
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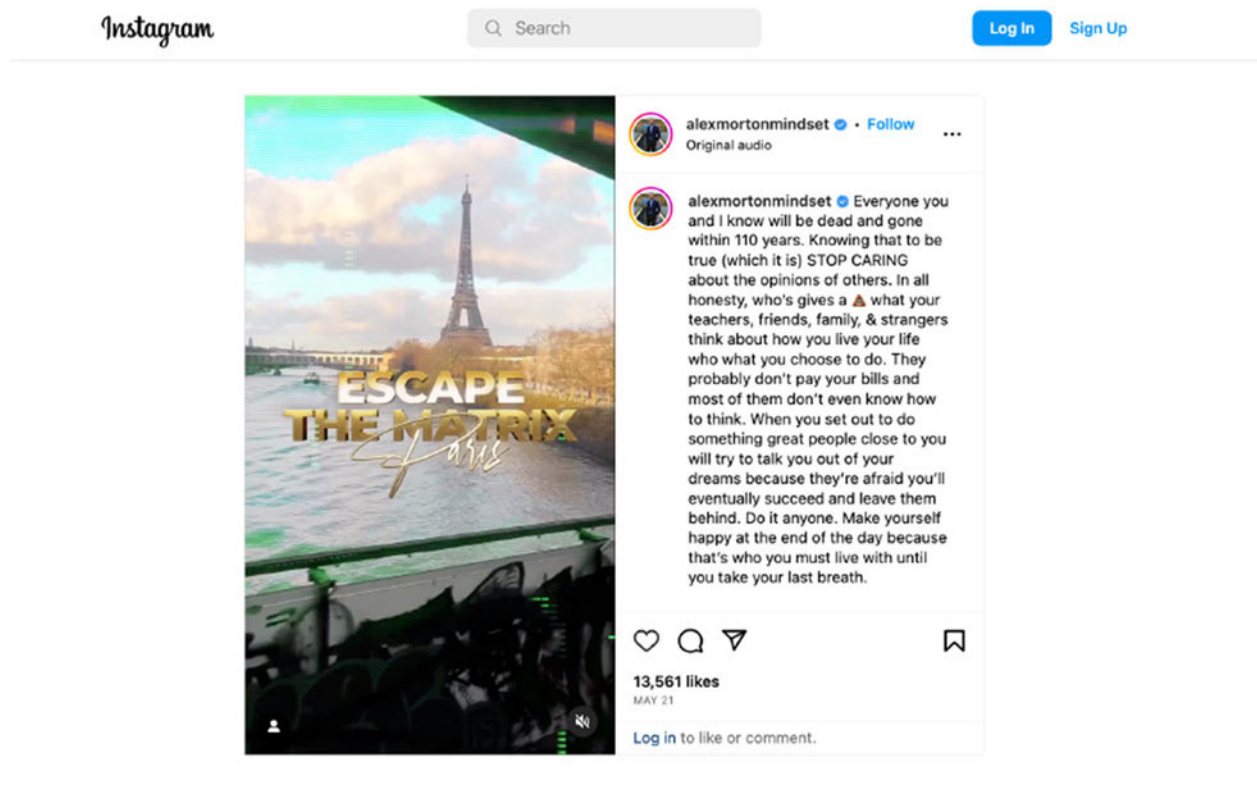
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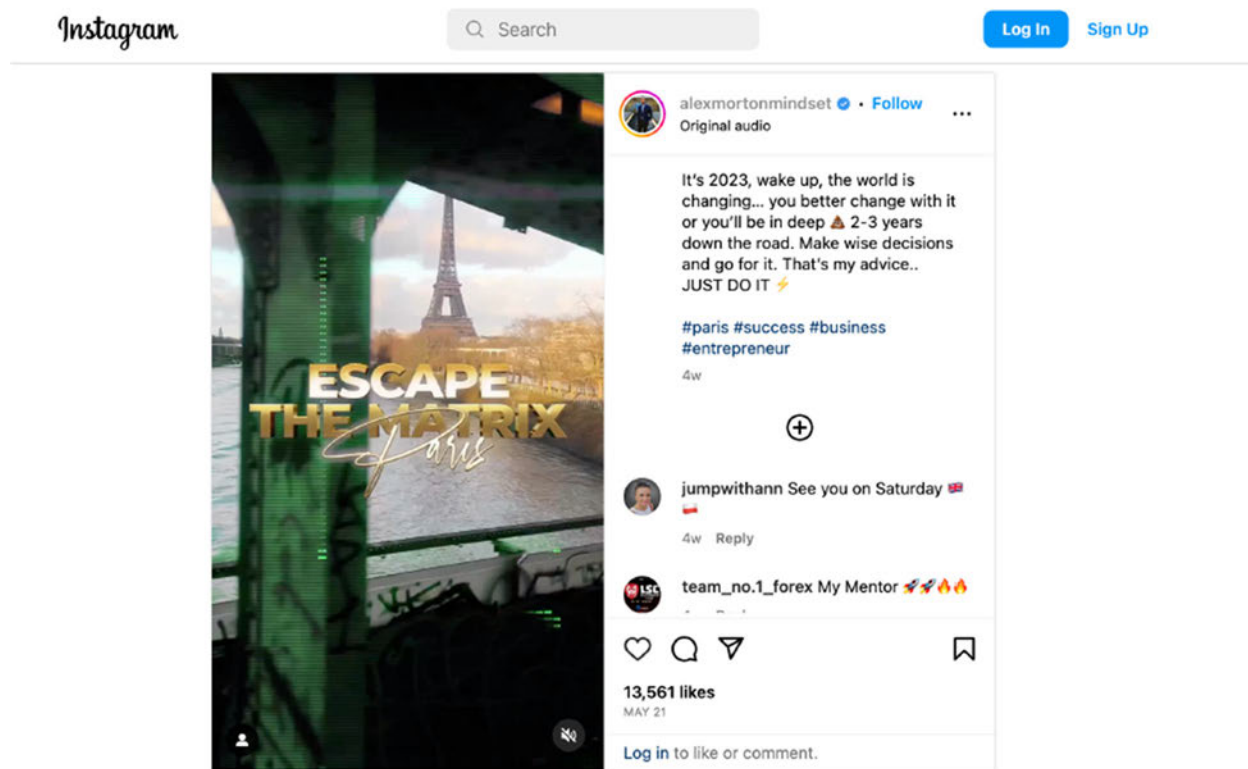
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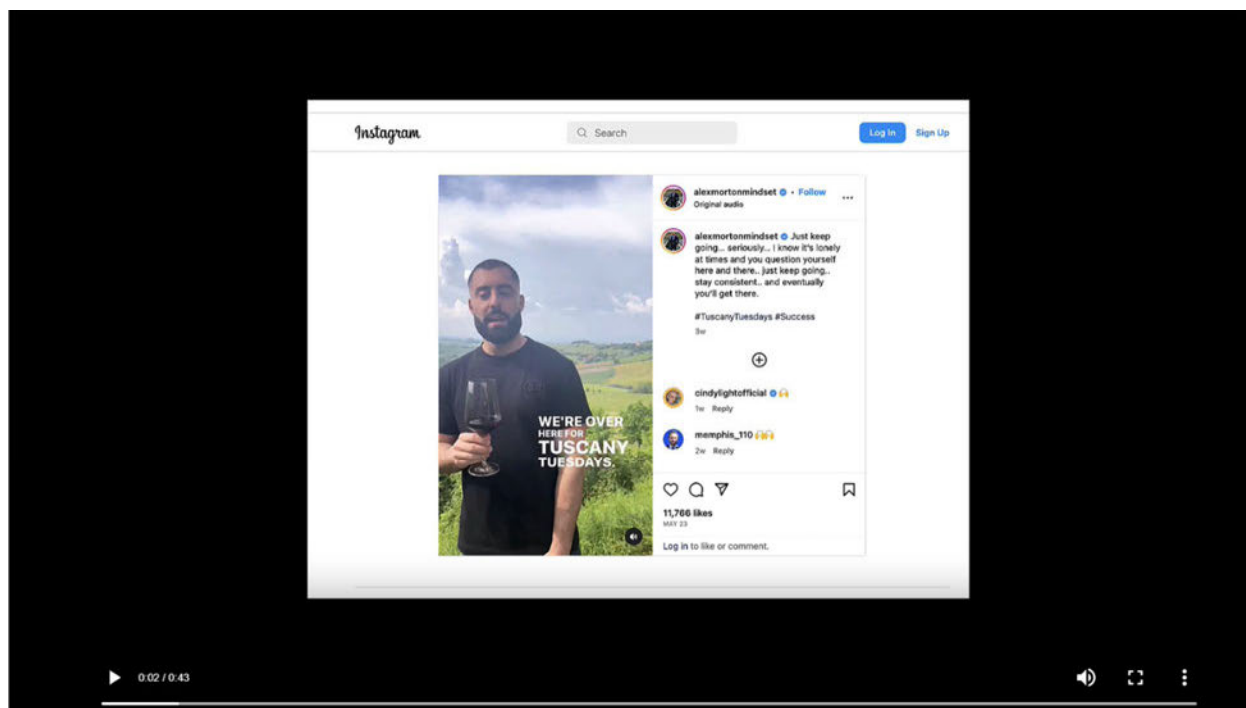
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IML_AlexM_IG_5_23_23

Attachment V

OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. 2123090
TITLE IM MASTERY
DATE RECORDED: NOVEMBER 6, 2022
TRANSCRIBED: AUGUST 29, 2023
PAGES 1 THROUGH 6

ALEX-MORTON-IG-11_6_22

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Alex-Morton-IG-11_6_22

IM Mastery

11/6/2022

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FEDERAL TRADE COMMISSION

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Alex-Morton-IG-11_6_22

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Alex-Morton-IG-11_6_22

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Alex-Morton-IG-11_6_22

IM Mastery

11/6/2022

1 P R O C E E D I N G S

2 - - - - -

3 Alex-Morton-IG-11_6_22

4 ALEX MORTON: Happy Sunday coming to you
5 from Phi Phi Island, Thailand. Listen up, January
6 19th through the 22nd, I'm going to be teaching
7 everybody how I've done, what I've been able to do.
8 Life was not always like this. Growing up in the
9 Midwest, Bexley, Ohio, I saw the rich, I saw the
10 middle, and I saw the poor. And I said, you know
11 what, one day I'm going to figure out how to get rich,
12 how to stay rich, and then how to teach other people
13 how to get rich. And I'm not just talking about
14 money. I'm talking about an overall balance, amazing
15 life, living on purpose. and living in an
16 extraordinary experience while on Planet Earth.

17 And, hey, I was going to do this event with
18 my mentor, Bob Proctor. Obviously, rest in paradise.
19 He's not going to be able to be there. But I said,
20 you know what, I'm going to bring in some of the
21 people that I'm close to, some of the people that I've
22 learned a lot from, like Grant Cardone, Ed Mylett,
23 Stormy Wellington, Gary Brecka, Pace Morby, Ian
24 Fleischman, and a couple others that are going to
25 absolutely change your paradigm, change your life, and

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Alex-Morton-IG-11_6_22

IM Mastery

11/6/2022

1 give you the strategies and the techniques to excel
2 and accelerate in 2023.

3 So click the link below, grab your tickets.

4 Early bird pricing is still available. And I'll tell

5 you what, it's taken me 12 years to build what it is

6 I've been able to build. I'm going to teach it to you

7 in 72 hours in January. Let's make 2023 your best

8 year ever. Break the code and God bless.

9 (The video recording was concluded.)

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Alex-Morton-IG-11_6_22

IM Mastery

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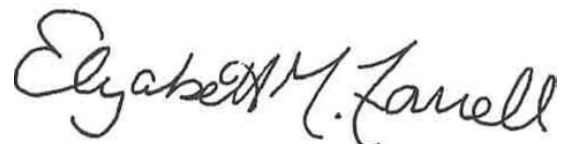
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TRANSCRIBED: AUGUST 29, 2023
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IML-MATTR_YT_3_20_23-CLIP

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IML-MattR-YT_3_20_23-CLIP

IM Mastery

5/10/2019

1 FEDERAL TRADE COMMISSION

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IML-MattR-YT_3_20_23-CLIP

IM Mastery

5/10/2019

1 P R O C E E D I N G S

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3 iML-MattR-YT_3_20_23-CLIP

4 MATT R: Chairman, make some noise.

5 (Cheering, applause.)

6 MATT R: Everywhere that you look, there's
7 success right next to you. Everywhere that you look,
8 you can see people that have made this thing happen.

9 When I first got started, I didn't have
10 that. When I first got started, I had belief in
11 myself and that's it. I had belief in Christopher
12 Terry, I believed in Jason Brown. When I was 24 and
13 we were packing out arenas, that was before we were
14 going around the world speaking, that was before I had
15 over 400 chairmen inside of my organization. I was
16 simply having faith.

17 Faith is the substance of things hoped for
18 without the evidence of things yet seen. The proof is
19 in the pudding. As you look all around you, you see
20 the people that are becoming educators. You see the
21 people that are going out and becoming Chairmens,
22 Platinum 1000s, 2000s. It's right in front of you.

23 (The video recording was concluded.)

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IM Mastery

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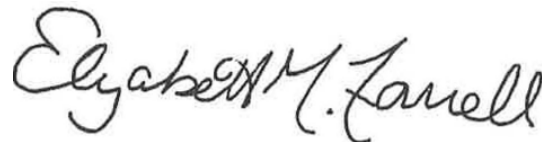
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PAGES 1 THROUGH 7

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IML-AlexM-YT_3_20_23-B-CLIP

IM Mastery

3/20/2023

1 FEDERAL TRADE COMMISSION

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IM Mastery

3/20/2023

1 P R O C E E D I N G S
2 - - - - -
3 IML_AlexM_YT_3_20_23-B-CLIP
4 ALEX MORTON: -- to take this company to \$1
5 billion.
6 (Cheering, applause.)
7 ALEX MORTON: Start that song over, please.
8 We want it to shake this place.
9 (Music playing.)
10 ALEX MORTON: Ladies and gentlemen, it's
11 your time. Put your hands up. Put your hands up.
12 (Cheering, applause.)
13 ALEX MORTON: \$1 billion (inaudible). Let's
14 go.
15 (Cheering, applause, dancing.)
16 ALEX MORTON: Where are my chairmen at?
17 Where are my chairmen at? Where are my chairmen at?
18 Where are my chairmen at? Where are my future
19 chairmen at? Make some noise.
20 (Cheering, applause.)
21 ALEX MORTON: So, ladies and gentlemen, it's
22 the fourth quarter of the weekend. Just a few more
23 speakers. This is where the champions are made. How
24 many of you know in your heart you're a champion?
25 (Cheering, applause.)

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IML-AlexM-YT_3_20_23-B-CLIP

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1 ALEX MORTON: How many of you know in your
2 heart you deserve more?

3 (Cheering, applause.)

4 ALEX MORTON: How many of you know in your
5 heart you're going to be the one person in your family
6 to go out there and really change the world?

7 (Cheering, applause.)

8 ALEX MORTON: So I got to say I'm so
9 grateful to still be a part of this amazing company.
10 I got started in this profession at 21 years old. I
11 was broke, I was busted, I was disgusted. And I got
12 to tell you this industry changed my life, it saved my
13 life. I've been in the game for 13 years. I've been
14 fortunate to travel to over 76 countries around the
15 world. And I have never felt the emotions that I feel
16 right now.

17 (Cheering, applause.)

18 ALEX MORTON: I have never felt the love,
19 the unity, the trust, the respect that I feel right
20 now inside this company. And I know what's about to
21 happen. Do you know what's about to happen? Massive
22 success --

23 (Cheering, applause.)

24 ALEX MORTON: -- in each and every one of
25 your lives if you make the decision to go all in.

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IML-AlexM-YT_3_20_23-B-CLIP

IM Mastery

3/20/2023

1 Everybody say "all in."

2 AUDIENCE: All in.

3 ALEX MORTON: I'm going to give you guys 13

4 years in the next 30 minutes.

5 (Cheering, applause.)

6 (The video recording was concluded.)

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IML-AlexM-YT_3_20_23-B-CLIP

IM Mastery

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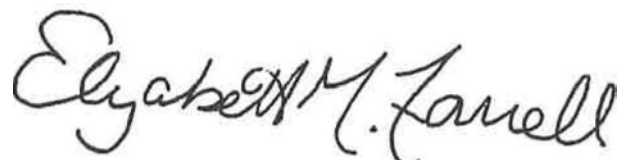
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TITLE IM MASTERY
DATE RECORDED: APRIL 22, 2023
TRANSCRIBED: AUGUST 29, 2023
PAGES 1 THROUGH 6

IML_ALEXM_IG_4_22_23

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IML-AlexM-IG_4_22_23

IM Mastery

4/22/2023

1 FEDERAL TRADE COMMISSION

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IM Mastery

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IML-AlexM-IG_4_22_23

IM Mastery

4/22/2023

1 P R O C E E D I N G S

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3 IML_AlexM_IG_4_22_23

4 (Music playing.)

5 ALEX MORTON: Just pulled up to the 7-Eleven
6 before going to shoot this podcast and this super
7 awesome guy, single father with his son walks up to me
8 and says, hey, bro, saw your truck, man, are you
9 hiring, right? And this brought this idea to me, I
10 wanted to do this quick little video because I
11 remember being 16, 17, you know, 18 in Ohio, Columbus,
12 Ohio, and then, obviously, Phoenix, Arizona, and I
13 would see people pull up in nice cars in Scottsdale
14 and I would go up to them, introduce myself, ask them
15 what they do, try to get knowledge, try to get wisdom,
16 try to get some information.

17 So if you're watching this video and you are
18 somewhere and you see somebody with a nice watch, a
19 nice car, nice clothes, don't be afraid to walk
20 straight up to that man or woman, introduce yourself
21 and say, hey, what do you do. You want to always be
22 searching for information and opportunities.

23 We exchanged contact information. I'm going
24 to send him some information on our company. I said,
25 hey, man, we teach people how to make money on our

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IML-AlexM-IG_4_22_23

IM Mastery

4/22/2023

1 cell phone, we teach people how to set up additional
2 streams of income. And he's like, yeah, man, send me
3 info, bro. I want to know more, right?

4 So if you're watching this and you're not
5 where you want to be, you know, in your life
6 financially and you come across an opportunity, take
7 hold of that opportunity, all right? Take hold of
8 that opportunity. Walk up to people, have confidence,
9 shake their hand, look them in the eye, exchange
10 information, because you never know -- you never know,
11 you are one handshake, one friendship, one
12 relationship, one encounter from completely altering
13 your financial situation.

14 Go out there and be great.

15 (The video recording was concluded.)

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IML-AlexM-IG_4_22_23

IM Mastery

4/22/2023

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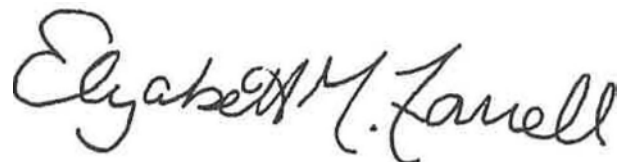
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| DATE | RECORDED: MAY 4, 2023 TRANSCRIBED: AUGUST 29, 2023 |
| PAGES | 1 THROUGH 6 |

IML_ALEXM_IG_5_4_23

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IML-AlexM-IG_5_4_23

IM Mastery

5/4/2023

1 FEDERAL TRADE COMMISSION

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IM Mastery

5/4/2023

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IML-AlexM-IG_5_4_23

IM Mastery

5/4/2023

1 P R O C E E D I N G S

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3 IML_AlexM_IG_5_4_23

4 (Music playing.)

5 UNKNOWN SPEAKER: Like what are the key
6 things that you teach people on how to do it and can
7 anybody do that? If you find a kid that's 18, 19, can
8 you help them also become a millionaire by 24 or does
9 it vary on people?

10 ALEX MORTON: It varies on their level of
11 discipline, desire, and their ability to be teachable
12 and coachable. Writing down your goals in the present
13 tense is a big thing.

14 You know, when I was 21, I said, I'm so
15 happy and grateful now that I am a millionaire before
16 my 25th birthday. Everyone said I was nuts, crazy,
17 stupid. That stuff doesn't work. Oh, personal
18 development is a bunch of hocus-pocus. I'm like, you
19 can think whatever you want, think and grow rich is
20 real.

21 UNKNOWN SPEAKER: Yeah.

22 ALEX MORTON: Robert Kiyosaki is -- like
23 these -- Tony Robbins is -- these are real people with
24 real results with amazing lifestyles, right?

25 So writing down your goals -- and then one

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IML-AlexM-IG_5_4_23

IM Mastery

5/4/2023

1 of my biggest points of direction is find somebody
2 that has exactly what you want and do exactly what it
3 is they do.

4 (The video recording was concluded.)

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IM Mastery

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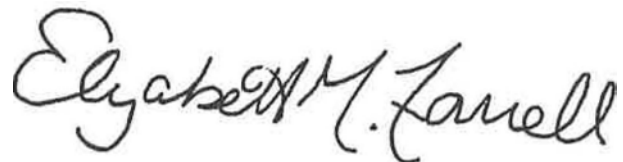
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OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. 2123090
TITLE IM MASTERY
DATE RECORDED: MAY 21, 2023
TRANSCRIBED: AUGUST 29, 2023
PAGES 1 THROUGH 5

IML_ALEXM_IG_5_21_23

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IML_AlexM_IG_5_21_23

IM Mastery

5/21/2023

1 FEDERAL TRADE COMMISSION

2 I N D E X

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7 May 21, 2023

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12 digital file provided to For The Record, Inc. on
13 August 16, 2023.

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1 P R O C E E D I N G S

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3 IML_AlexM_IG_5_21_23

4 (Music playing.)

5 ALEX MORTON: Stop caring about what people
6 think about you. Most people, they don't even know
7 how to think. So why do you care what your friends
8 say, what your family says?

9 Well, my parents told me this is a bad idea,
10 my cousin said these things don't work. Before you
11 listen to somebody's advice, you better look at their
12 house, their car, their bank account, their health,
13 and their results. That's what I do.

14 If you don't have what I want, I ain't
15 listening to you. And we may have the same last name,
16 but if you don't have what I want, I'm not listening
17 to you.

18 Can I tell you the truth? Stop listening to
19 everybody's opinion. Stop thinking everything is too
20 good to be true. Stop limiting yourself.

21 (The video recording was concluded.)

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1 CERTIFICATE OF TRANSCRIPTIONIST

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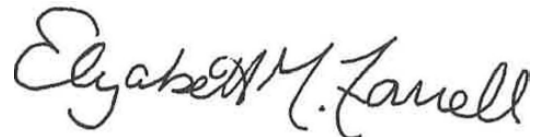
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I, Elizabeth M. Farrell, do hereby certify that the foregoing proceedings and/or conversations were transcribed by me via CD, videotape, audiotape or recording, and reduced to typewriting under my supervision; that I had no role in the recording of this material; and that it has been transcribed to the best of my ability given the quality and clarity of the recording media.

I further certify that I am neither counsel for, related to, nor employed by any of the parties to the action in which these proceedings were transcribed; and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

DATE: 8/29/2023



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4 (Music playing.)

5 ALEX MORTON: We're over here for Tuscany
6 Tuesdays. Listen, no sales strategies, no marketing
7 strategies, no brand building strategies, just one
8 simple message from my heart to yours.

9 You're an entrepreneur, you have big goals
10 and big dreams. On your journey, you're going to have
11 lots of challenges, lot of setbacks. People are going
12 to call you insane, crazy, nuts, and psychotic. But
13 guess what? If you fight through all the nonsense,
14 all the BS, all the hate, you continue to listen to
15 the right people and work hard every single day, one
16 day you can be at Tuscany Tuesdays, maybe with me,
17 drinking some vino, and enjoying la dolce vita.

18 Keep going. Never quit. God bless. Let's
19 go.

20 (The video recording was concluded.)

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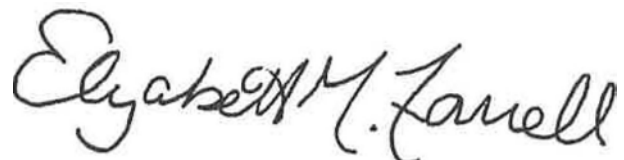
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